UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
999 18TH STREET - SUITE 300
DENVER, CO 80202-2466
Phone 800-227-8917
http://www.epa.gov/region08

June 28, 2005

Ref: ENF-L

**BY U.S. MAIL**
Kevin Murray, Esq.
Mabey & Murray, LC
1000 Kearns Building
136 South Main Street
Salt Lake City, Utah 84101

Brian Burnett, Esq.
Callister Nebeker & McCullough
Gateway Tower East Suite 900
10 East South Temple
Salt Lake City, Utah 84133

Robin Main, Esq.
Holland & Knight
One Financial Plaza
Providence, RI 02903

Dear Counsel:

The U.S. Environmental Protection Agency (EPA) has received letters from each of you concerning the May 26, 2005 global settlement proposal for the Vermiculite Intermountain Superfund Site (Site). Two of the letters requested further information and one proposed a different settlement framework. The purpose of this letter is to provide appropriate responsive information concerning costs, future work and the potential for recovery from other parties, as well as to respond to the new settlement proposal.

Costs

EPA has expended $2,340,234.95 through May 31, 2005. I have enclosed for your review an Itemized Cost Summary reflecting these expenditures (Enclosure 1). This summary provides details on EPA payroll, EPA travel, direct contract costs and application of the indirect rate. The majority of work performed related to investigation and assessment of the Site, oversight of PacifiCorp's cleanup, cleanup of Artistic Imaging and the cleanup of the Frank Edwards Building. To assist you in understanding this work I have enclosed several documents:

1) delivery orders (Enclosure 2); 2) statements of work (Enclosure 3); and 3) pollution reports (Enclosure 4). I am aware that a statement of work for Artistic Imaging and Pollution Report #5 are missing and will attempt to get those to you in the near future.

In order to assist in determining appropriate settlement contributions, EPA has estimated the share of past response costs attributable to investigation, assessment and oversight, cleanup of the Frank Edwards Building and cleanup of Artistic Imaging. These numbers are illustrative only and are not meant to be determinative of a settlement framework.

| | **Artistic Imaging** | **Frank Edwards** | **Investigation(Other)** |
|---|---|---|---|
| ERRS | 655,000 | 391,000 | |
| Volpe | 142,000 | 29,000 | 328,154 |
| EPA | 45,506 | 9,320 | 106,429 |
| | 842,506 | 429,320 | 434,583 |
| Indirect Rate (37.12%) | 312,738 | 159,363 | 161,317 |
| Total | 1,155,244 | 588,683 | 595,900 |

(While the totals vary by several thousand from the Cost Summary, these numbers are offered only to illustrate general allocations between tasks.)

Future Work

As I have indicated in the past, EPA cannot predict the exact cost of cleaning up the remaining amphibole asbestos contamination on the La Quinta property. On November 24, 2004, Floyd Nichols transmitted to Ellison Stollenwerck a letter describing EPA's understanding of the contamination that might be present under the parking lot. That letter is enclosed as Enclosure 5. Joyce Ackerman, the current On-Scene Coordinator, believes the cleanup is not likely to exceed $1 million, but the Agency cannot guarantee this. This cost could be substantially diminished by having a Bona Fide Prospective Purchaser perform the removal of contaminants during excavation for redevelopment.

Contributions from Non-named Parties

EPA continues to pursue a claim against W.R. Grace for its potential liability regarding this Site. EPA asserts that W.R. Grace may be an operator of the site under Section 107(a)(1) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9607(a)(1), or a person who arranged for the treatment or disposal of hazardous substances at the Site pursuant to Section 107(a)(3) of CERCLA, 42 U.S.C. § 9607(a)(3). The Department of Justice, on behalf of EPA, has made a claim in the W.R. Grace bankruptcy proceeding seeking reimbursement of costs related to the cleanup of this Site. We continue to

believe that the claim, as originally stated, will accomplish our reimbursement goal. As indicated in my last letter, we expect Grace to pay approximately $500,000 of the costs at the Site.

La Quinta has requested that the Frank Edwards family contribute as former owners of the La Quinta property. EPA has no evidence that the Frank Edwards family rented property to the operating facility, nor that there was a failure of appropriate inquiry. EPA may seek further information from the Frank Edwards family to determine if there is a rationale basis for liability. However, EPA cannot delay negotiations and, ultimately, complete cleanup pending resolution of this issue.

Settlement Framework

EPA has fully evaluated the orphan share issue and determined, pursuant to its enforcement discretion, that an orphan share will not be available at this site. Region 8 has raised the affiliation issue to headquarters' staff directly involved in orphan share implementation and has received confirmation that the policy should not apply.

EPA based the initial proposal for a settlement framework on the understanding that PacifiCorp had spent approximately $4.5 million in performing response actions at the Site. However, as indicated in its June 14th letter, PacifiCorp has spent $3.5 million. While this difference would seem to affect the initial proposal, a reevaluation of the relative contribution of contaminants by each party suggests otherwise. As EPA has indicated on multiple occasions, it believes that PacifiCorp did lease the Site to Vermiculite Intermountain during operation of the vermiculite facility, whether exfoliation was occurring or not. However, EPA agrees that the relative contribution of amphibole asbestos contamination during this period would likely be less than the contribution from 1974 - 1984. It thus appears appropriate to leave the proposal as stated in EPA's May 26th letter. Assuming the future cleanup on the La Quinta property would cost $1 million, PacifiCorp would end up paying approximately $2,750,000, Van Cott approximately $3,295,000 and La Quinta approximately $794,000. If the La Quinta cleanup cost less than $1 million, the first $500,000 of reduced costs would come off La Quinta's share, and any savings beyond that from Van Cott's respective share. Any funds to be received from W.R. Grace would be proportionately deducted from each party's total (absent any favorable ruling on PacifiCorp's claim against Grace in bankruptcy.)

PacifiCorp requests that La Quinta pay significantly more towards cleanup and past response costs on its property so that Van Cott can pay substantially more to PacifiCorp in contribution. EPA disagrees. While PacifiCorp and Van Cott are similarly situated based on their liability, La Quinta may only have liability because of an alleged failure to pursue appropriate inquiry. La Quinta's share in settlement should remain substantially less than that of PacifiCorp and Van Cott. EPA believes that the allocation discussed in the previous paragraph provides a better settlement framework. As indicated in my prior letter, neither EPA or DOJ management has approved this settlement framework. It is proposed for discussion purposes only.

I hope this letter provides the information needed to continue and accelerate our settlement negotiations. I will call each of you next week to further discuss these matters. If you have any questions, please give me a call at (303) 312-6853.

Sincerely,

Matthew Cohn
Legal Enforcement Program

cc: Kelcey Land, ENF-RC
Joyce Ackerman, EPR-SA

# Enclosure 1

Certified By Financial Management Office

Itemized Cost Summary

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

| | |
|---|---|
| **REGIONAL PAYROLL COSTS** | $109,633.00 |
| **HEADQUARTERS PAYROLL COSTS** | $5,598.61 |
| **REGIONAL TRAVEL COSTS** | $26,203.49 |
| **HEADQUARTERS TRAVEL COSTS** | $2,767.06 |
| **EMERGENCY REMOVAL CLEANUP (ERC)** | |
| ENVIRONMENTAL RESTORATION, LLC (68-W0-1053) | $1,046,293.19 |
| **ENFORCEMENT SUPPORT SERVICES (ESS)** | |
| SCIENCE APPLICATION INTERNATIONAL CORPS (68-S9-0010) | $14,906.85 |
| TOEROEK ASSOCIATES, INC. (68-W9-9050) | $2,148.70 |
| **INTERAGENCY AGREEMENT (IAG)** | |
| DEPARTMENT OF TRANSPORTATION (DW69953792) | $499,154.83 |
| **EPA INDIRECT COSTS** | $633,529.22 |
| **Total Site Costs:** | $2,340,234.95 |

Certified By Financial Management Office

Regional Payroll Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

| Employee Name | Fiscal Year | Pay Period | Payroll Hours | Payroll Costs |
|---|---|---|---|---|
| ACKERMAN, JOYCE MARYMEE | 2003 | 08 | 1.00 | 55.61 |
| MARYMEE, JOYCE A. | | 10 | 5.00 | 281.26 |
| ENV ENGINEER | | 11 | 0.50 | 28.12 |
| | | 13 | 0.50 | 28.14 |
| | 2005 | 10 | 10.00 | 603.82 |
| | | 11 | 0.50 | 29.80 |
| | | 12 | 7.00 | 415.83 |
| | | 13 | 2.50 | 147.91 |
| | | 16 | 3.50 | 207.93 |
| | | 17 | 0.50 | 29.76 |
| | | 18 | 1.00 | 59.41 |
| | | | 32.00 | $1,887.59 |
| BOHAN, SUZANNE J. | 2005 | 07 | 4.00 | 247.02 |
| GENERAL ATTORNEY | | 08 | 3.00 | 185.29 |
| | | | 7.00 | $432.31 |
| BROSTE, DAVID L | 2004 | 03 | 4.50 | 223.55 |
| INVESTIGATOR | | 04 | 6.00 | 298.06 |
| | | 05 | 3.00 | 149.03 |
| | | 07 | 7.00 | 347.68 |
| | | 08 | 4.00 | 198.68 |
| | | 09 | 2.50 | 127.46 |
| | | 10 | 1.00 | 50.99 |
| | | 11 | 5.00 | 254.92 |
| | | 12 | 4.00 | 203.93 |
| | | 13 | 1.00 | 50.99 |
| | | 14 | 1.00 | 50.99 |
| | | 15 | 6.00 | 312.30 |
| | | 16 | 2.00 | 104.10 |
| | | 18 | 0.50 | 26.02 |
| | | 20 | 1.00 | 52.05 |
| | | 23 | 1.00 | 52.05 |
| | 2005 | 03 | 4.00 | 212.41 |
| | | 04 | 2.00 | 106.20 |

Certified By Financial Management Office

Regional Payroll Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

| Employee Name | Fiscal Year | Pay Period | Payroll Hours | Payroll Costs |
|---|---|---|---|---|
| BROSTE, DAVID L | 2005 | 07 | 2.00 | 106.20 |
| | | | 57.50 | $2,927.61 |
| CHIPP, WENDY N. | 2004 | 03 | 9.00 | 287.55 |
| PUBLIC AFFAIRS SPECIALIST | | | | |
| | | | 9.00 | $287.55 |
| COHN, MATTHEW D. | 2003 | 24 | 8.00 | 550.46 |
| GENERAL ATTORNEY | | 27 | 1.75 | 114.54 |
| | 2004 | 03 | 3.75 | 245.48 |
| | | 04 | 1.25 | 81.85 |
| | | 05 | 1.00 | 65.45 |
| | | 06 | 2.75 | 180.03 |
| | | 08 | 4.50 | 309.63 |
| | | 09 | 5.00 | 351.94 |
| | | 10 | 10.00 | 703.89 |
| | | 11 | 7.00 | 492.70 |
| | | 12 | 8.50 | 598.29 |
| | | 14 | 10.50 | 739.06 |
| | | 15 | 23.00 | 1,654.15 |
| | | 16 | 20.00 | 1,438.39 |
| | | 18 | 14.00 | 1,006.88 |
| | | 19 | 2.00 | 143.84 |
| | | 20 | 7.00 | 503.44 |
| | | 21 | 1.50 | 107.88 |
| | | 23 | 1.00 | 71.92 |
| | | 24 | 1.00 | 71.92 |
| | | 25 | 1.00 | 71.92 |
| | 2005 | 03 | 2.00 | 137.43 |
| | | 09 | 0.50 | 37.49 |
| | | 11 | 1.00 | 74.98 |
| | | 12 | 2.00 | 149.93 |
| | | 13 | 7.00 | 522.70 |
| | | 14 | 3.00 | 224.89 |
| | | 16 | 0.50 | 37.49 |
| | | 17 | 9.00 | 674.70 |

Certified By Financial Management Office

Regional Payroll Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

| Employee Name | Fiscal Year | Pay Period | Payroll Hours | Payroll Costs |
|---|---|---|---|---|
| COHN, MATTHEW D. | 2005 | 18 | 9.50 | 712.20 |
| | | | 169.00 | $12,075.47 |
| GOLDEN, DANIELA D<br>THIGPEN, DANIELA D.<br>ENV PROT SPEC | 2005 | 13 | 1.50 | 66.78 |
| | | | 1.50 | $66.78 |
| LAND, KELCEY YARBROUGH<br>ENV PROT SPEC | 2003 | 24 | 1.00 | 49.65 |
| | | 25 | 1.00 | 49.65 |
| | 2004 | 03 | 2.50 | 124.12 |
| | | 04 | 1.00 | 49.65 |
| | | 06 | 1.50 | 74.48 |
| | | 08 | 2.00 | 99.29 |
| | | 10 | 3.00 | 152.60 |
| | | 14 | 8.00 | 406.94 |
| | | 15 | 6.00 | 311.61 |
| | | 16 | 1.00 | 51.94 |
| | | 17 | 2.00 | 103.87 |
| | | 19 | 1.50 | 77.90 |
| | | 23 | 1.00 | 51.94 |
| | 2005 | 06 | 4.00 | 206.86 |
| | | 12 | 3.00 | 164.51 |
| | | 13 | 2.00 | 109.67 |
| | | 17 | 2.00 | 109.67 |
| | | 18 | 3.00 | 164.51 |
| | | | 45.50 | $2,358.86 |
| LANGE, ALAN U.<br>ENV SCIENTIST | 2004 | 15 | 2.00 | 113.47 |
| | | 16 | 31.00 | 1,647.30 |
| | | | 33.00 | $1,760.77 |
| MANLET, NANCY L.<br>FIN. MGMT. SPECIALIST | 2004 | 13 | 6.00 | 185.01 |
| | | 14 | 10.00 | 308.36 |
| | | | 16.00 | $493.37 |
| MILLER, AUBREY | 2004 | FB | 9.00 | 463.44 |

Certified By Financial Management Office

Regional Payroll Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

| Employee Name | Fiscal Year | Pay Period | Payroll Hours | Payroll Costs |
|---|---|---|---|---|
| PHS | | | | |
| | | | 9.00 | $463.44 |
| MUELLER, NANCY H | 2004 | 03 | 15.50 | 684.34 |
| PUBLIC AFFAIRS SPECIALIST | | 04 | 1.00 | 44.15 |
| | | 07 | 0.50 | 22.07 |
| | | 08 | 0.50 | 22.07 |
| | | 10 | 2.00 | 90.27 |
| | | 13 | 1.00 | 45.14 |
| | | 14 | 0.50 | 22.57 |
| | | 15 | 1.00 | 46.11 |
| | | 16 | 0.50 | 23.05 |
| | | 24 | 1.00 | 46.11 |
| | 2005 | 13 | 0.50 | 24.52 |
| | | | 24.00 | $1,070.40 |
| MYERS, CRAIG | 2004 | 05 | 2.00 | 50.75 |
| ENVIRONMENTAL ENGINEER | | 06 | 32.00 | 826.72 |
| | | 07 | 1.00 | 25.36 |
| | | 08 | 1.00 | 25.37 |
| | | 10 | 1.00 | 26.04 |
| | | 11 | 14.00 | 381.95 |
| | | 12 | 1.00 | 26.04 |
| | | 13 | 18.00 | 468.74 |
| | | 14 | 26.50 | 690.10 |
| | | 15 | 75.00 | 2,076.66 |
| | | 17 | 14.00 | 411.47 |
| | | 18 | 84.50 | 2,393.01 |
| | | 19 | 27.50 | 740.02 |
| | | 20 | 60.00 | 1,636.23 |
| | 2005 | 03 | 20.00 | 644.52 |
| | | | 377.50 | $10,422.98 |
| NICHOLS, FLOYD D. | 2003 | 15 | 17.00 | 924.44 |
| ENV ENGINEER | | 16 | 7.00 | 380.64 |
| | | 17 | 7.00 | 380.97 |
| | | 18 | 31.00 | 1,643.76 |

Certified By Financial Management Office

Regional Payroll Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

| Employee Name | Fiscal Year | Pay Period | Payroll Hours | Payroll Costs |
|---|---|---|---|---|
| NICHOLS, FLOYD D. | 2003 | 19 | 26.00 | 1,415.02 |
| | | 20 | 10.00 | 544.25 |
| | | 21 | 20.00 | 1,088.20 |
| | | 23 | 50.00 | 2,720.03 |
| | | 24 | 28.00 | 1,523.46 |
| | | 25 | 7.00 | 380.87 |
| | | 26 | 30.00 | 1,632.29 |
| | | 27 | 34.00 | 1,849.92 |
| | 2004 | 01 | 11.00 | 468.37 |
| | | 02 | 14.00 | 761.72 |
| | | 03 | 71.00 | 3,819.74 |
| | | 04 | 8.00 | 435.27 |
| | | 05 | 18.00 | 979.36 |
| | | 06 | 6.00 | 326.46 |
| | | 07 | 12.00 | 652.88 |
| | | 08 | 13.00 | 707.27 |
| | | 09 | 16.00 | 893.08 |
| | | 10 | 29.00 | 1,501.89 |
| | | 11 | 23.00 | 1,283.80 |
| | | 12 | 20.00 | 1,116.35 |
| | | 13 | 30.00 | 1,655.58 |
| | | 16 | 23.00 | 1,310.91 |
| | | 17 | 51.00 | 2,800.30 |
| | | 18 | 122.00 | 5,391.13 |
| | | 20 | 55.00 | 3,081.60 |
| | | 21 | 19.00 | 1,082.93 |
| | | 22 | 27.00 | 1,538.90 |
| | | 23 | 15.00 | 854.95 |
| | | 24 | 46.00 | 2,600.57 |
| | | 25 | 50.00 | 2,770.08 |
| | | 26 | 12.00 | 869.30 |
| | 2005 | 02 | 50.00 | 2,595.63 |
| | | 03 | 29.00 | 1,480.50 |
| | | 04 | 47.00 | 2,427.80 |
| | | 05 | 40.00 | 2,120.52 |
| | | 06 | 60.00 | 3,036.52 |

Certified By Financial Management Office

Regional Payroll Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

| Employee Name | Fiscal Year | Pay Period | Payroll Hours | Payroll Costs |
|---|---|---|---|---|
| NICHOLS, FLOYD D. | 2005 | 07 | 64.00 | 3,334.90 |
| | | 08 | 52.00 | 2,686.27 |
| | | 09 | 10.00 | 514.66 |
| | | 10 | 20.00 | 1,109.44 |
| | | 11 | 8.00 | 443.91 |
| | | | 1,338.00 | $71,136.44 |
| PADILLA, LAURIE A. | 2005 | 08 | 15.00 | 526.39 |
| FIN. MGMT. SPECIALIST | | 09 | 6.00 | 219.05 |
| | | 10 | 4.00 | 146.03 |
| | | | 25.00 | $891.47 |
| PENNOCK, SONYA S | 2004 | 18 | 1.00 | 63.08 |
| PUB AFFAIRS SPEC | | 21 | 0.50 | 31.54 |
| | 2005 | 18 | 2.50 | 164.13 |
| | | | 4.00 | $258.75 |
| POKORNY, CAROL J. | 2004 | 18 | 1.00 | 55.52 |
| ENVIRONMENTAL PROTECTION SPECIALIST | | 19 | 0.50 | 27.76 |
| | | 22 | 0.75 | 41.65 |
| | | 23 | 1.00 | 53.57 |
| | | 26 | 0.25 | 13.42 |
| | 2005 | 12 | 0.25 | 13.97 |
| | | | 3.75 | $205.89 |
| PRESSLEY, CHERYL | 2004 | 01 | 1.00 | 51.46 |
| ACCOUNTANT | | 02 | 4.00 | 205.73 |
| | | 03 | 0.50 | 25.71 |
| | 2005 | 09 | 1.00 | 56.30 |
| | | 10 | 1.25 | 70.37 |
| | | | 7.75 | $409.57 |
| ROMERO, DAVID | 2004 | 16 | 39.00 | 1,510.79 |
| ENV SCI (OSC) | | | | |
| | | | 39.00 | $1,510.79 |
| ROQUEMORE, SHEILA R. | 2004 | 02 | 0.50 | 16.73 |

Certified By Financial Management Office

Regional Payroll Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

| Employee Name | Fiscal Year | Pay Period | Payroll Hours | Payroll Costs |
|---|---|---|---|---|
| VEASLEY, SHEILA R. | | | | |
| FINANCIAL MGMT SPECIALIST | | | | |
| | | | 0.50 | $16.73 |
| SHIP, JAYME | 2003 | 24 | 32.00 | 550.14 |
| (ASST. REG COUNSEL) | | 26 | 8.00 | 137.53 |
| | | | 40.00 | $687.67 |
| SISK, RICHARD L | 2003 | 10 | 3.50 | 208.88 |
| GENERAL ATTORNEY | | 11 | 1.00 | 59.68 |
| | | | 4.50 | $268.56 |
| Total Regional Payroll Costs | | | 2,243.50 | $109,633.00 |

Certified By Financial Management Office

Headquarters Payroll Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

| Employee Name | Fiscal Year | Pay Period | Payroll Hours | Payroll Costs |
|---|---|---|---|---|
| GILBERT, JOHN M. | 2004 | 14 | 44.00 | 2,764.39 |
| ENVIRONMENTAL ENGINEER | | 17 | 45.00 | 2,834.22 |
| | | | 89.00 | $5,598.61 |
| Total Headquarters Payroll Costs | | | 89.00 | $5,598.61 |

Certified By Financial Management Office

Regional Travel Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE
COSTS FROM 10/01/1980 THROUGH 05/31/05

| Traveler/Vendor Name | Travel Number | Treasury Schedule | Treasury Schedule Date | Travel Costs |
|---|---|---|---|---|
| ACKERMAN, JOYCE MARYMEE | TM0288854 | ACHA05049 | 02/23/2005 | 261.05 |
| MARYMEE, JOYCE A. | | | | |
| ENV ENGINEER | | | | |
| | | | | $261.05 |
| CHIPP, WENDY N. | TM0162298 | ACHA03323 | 11/21/2003 | 278.18 |
| PUBLIC AFFAIRS SPECIALIST | | | | |
| | | | | $278.18 |
| LANGE, ALAN U. | TM0206800 | ACHA04119 | 04/30/2004 | 786.10 |
| ENV SCIENTIST | | | | |
| | | | | $786.10 |
| MILLER, AUBREY | TM0187203 | ACHA04063 | 03/05/2004 | 288.45 |
| PHS | | | | |
| | | | | $288.45 |
| MUELLER, NANCY H | TM0161787 | ACHA03307 | 11/05/2003 | 243.90 |
| PUBLIC AFFAIRS SPECIALIST | | | | |
| | | | | $243.90 |
| MYERS, CRAIG | TM0171158 | ACHA04006 | 01/08/2004 | 700.72 |
| ENVIRONMENTAL ENGINEER | TM0180474 | ACHA04065 | 03/09/2004 | 79.70 |
| | TM0194126 | ACHA04093 | 04/06/2004 | 479.25 |
| | TM0202419 | ACHA04128 | 05/11/2004 | 1,005.20 |
| | TM0210855 | ACHA04133 | 05/14/2004 | 1,197.05 |
| | TM0215380 | ACHA04166 | 06/16/2004 | 967.19 |
| | TM0220608 | ACHA04168 | 06/18/2004 | 1,394.45 |

Certified By Financial Management Office

Regional Travel Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

| Traveler/Vendor Name | Travel Number | Treasury Schedule | Treasury Schedule Date | Travel Costs |
|---|---|---|---|---|
| MYERS, CRAIG | TM0224630 | ACHA04197 | 07/19/2004 | 1,163.30 |
| | | | | $6,986.86 |
| NATIONSBANK OF DELAWARE N.A. | TM0260812 | ACHC04317 | 11/16/2004 | 532.07 |
| | | | | $532.07 |
| NICHOLS, FLOYD D. | TM0105616 | ACHA03111 | 04/23/2003 | 323.26 |
| ENV ENGINEER | TM0112491 | ACHA03155 | 06/06/2003 | 450.19 |
| | TM0127744 | ACHA03190 | 07/11/2003 | 441.10 |
| | TM0134970 | ACHA03227 | 08/19/2003 | 344.16 |
| | TM0136653 | ACHA03238 | 08/28/2003 | 460.30 |
| | TM0142767 | ACHA03260 | 09/19/2003 | 334.93 |
| | TM0142776 | ACHA03280 | 10/09/2003 | 707.97 |
| | TM0168305 | ACHA03365 | 01/05/2004 | 491.25 |
| | TM0179568 | ACHA04034 | 02/05/2004 | 536.18 |
| | TM0182027 | ACHA04050 | 02/23/2004 | 494.77 |
| | TM0182418 | ACHA04055 | 02/26/2004 | 480.01 |
| | TM0194122 | ACHA04113 | 04/26/2004 | 427.41 |
| | TM0208958 | ACHA04159 | 06/09/2004 | 670.14 |
| | TM0215158 | ACHA04180 | 06/30/2004 | 1,440.86 |
| | TM0234362 | ACHA04208 | 07/28/2004 | 359.45 |
| | TM0227497 | ACHA04209 | 07/29/2004 | 536.13 |
| | TM0241158 | ACHA04232 | 08/23/2004 | 386.54 |
| | TM0245114 | ACHA04264 | 09/22/2004 | 493.79 |
| | TM0246135 | ACHA04264 | 09/22/2004 | 544.93 |
| | TM0246151 | ACHA04264 | 09/22/2004 | 497.73 |
| | TM0257124 | ACHA04300 | 10/28/2004 | 512.90 |
| | TM0257132 | ACHA04309 | 11/08/2004 | 490.77 |

Certified By Financial Management Office

Regional Travel Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

| Traveler/Vendor Name | Travel Number | Treasury Schedule | Treasury Schedule Date | Travel Costs |
|---|---|---|---|---|
| NICHOLS, FLOYD D. | TM0257139 | ACHA04310 | 11/09/2004 | 459.81 |
| | TM0268358 | ACHA04328 | 11/26/2004 | 507.73 |
| | TM0269806 | ACHA04349 | 12/16/2004 | 479.87 |
| | TM0269829 | ACHA04349 | 12/16/2004 | 765.81 |
| | TM0275290 | ACHA04363 | 12/30/2004 | 518.85 |
| | TM0275299 | ACHA05012 | 01/14/2005 | 521.17 |
| | TM0279034 | ACHA05013 | 01/18/2005 | 439.57 |
| | TM0268471 | ACHA05026 | 01/28/2005 | 518.20 |
| | TM0285606 | ACHA05026 | 01/28/2005 | 75.75 |
| | TM0288857 | ACHA05049 | 02/23/2005 | 343.68 |
| | | | | $16,055.21 |
| ROMERO, DAVID | TM0207778 | ACHA04119 | 04/30/2004 | 771.67 |
| ENV SCI (OSC) | | | | |
| | | | | $771.67 |
| Total Regional Travel Costs | | | | $26,203.49 |

Certified By Financial Management Office

Headquarters Travel Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

| Traveler/Vendor Name | Travel Number | Treasury Schedule | Treasury Schedule Date | Travel Costs |
|---|---|---|---|---|
| GILBERT, JOHN M. | TM0194074 | ACHA04091 | 04/02/2004 | 100.00 |
| ENVIRONMENTAL ENGINEER | TM0215428 | ACHA04139 | 05/20/2004 | 100.00 |
| | | | | $200.00 |
| NATIONSBANK OF DELAWARE N.A. | TM0194074 | ACHC04091 | 04/02/2004 | 1,246.44 |
| | TM0215428 | ACHC04139 | 05/20/2004 | 1,320.62 |
| | | | | $2,567.06 |
| Total Headquarters Travel Costs | | | | $2,767.06 |

Certified By Financial Management Office

Contract Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE
COSTS FROM 10/01/1980 THROUGH 05/31/05

EMERGENCY REMOVAL CLEANUP (ERC)

Contractor Name: ENVIRONMENTAL RESTORATION, LLC

EPA Contract Number: 68-W0-1053

Delivery Order Information

| DO # | Start Date | End Date |
|---|---|---|
| 8042 | 04/12/2004 | 01/17/2005 |

Project Officer(s): ZIMMERMAN, CHARLES

Dates of Service: From: 04/12/2004 To: 01/17/2005

Summary of Service:

Total Costs: $1,046,293.19

| Voucher Number | Voucher Date | Voucher Amount | Treasury Schedule Number and Date | Site Amount |
|---|---|---|---|---|
| 8042-01 | 05/10/2004 | 74,187.15 | 04441 06/03/2004 | 74,187.15 |
| 8042-02 | 06/21/2004 | 390,811.88 | 04519 07/15/2004 | 390,811.88 |
| 8042-03 | 08/11/2004 | 310,668.01 | 04615 09/08/2004 | 310,668.01 |
| 8042-04 | 09/08/2004 | 163,672.59 | 05017 10/12/2004 | 163,672.59 |
| 8042-05 | 10/14/2004 | 75,576.37 | 05076 11/09/2004 | 75,576.37 |
| 8042-06 | 12/01/2004 | 21,331.66 | 05177 12/28/2004 | 21,331.66 |
| 8042-07 | 04/06/2005 | 8,814.22 | 05422 05/02/2005 | 8,814.22 |
| 8042-08 | 04/21/2005 | 1,231.31 | 05462 05/18/2005 | 1,231.31 |
| | | | Total: | $1,046,293.19 |

Certified By Financial Management Office

Contract Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE
COSTS FROM 10/01/1980 THROUGH 05/31/05

ENFORCEMENT SUPPORT SERVICES (ESS)

Contractor Name: SCIENCE APPLICATION INTERNATIONAL CORPS

EPA Contract Number: 68-S9-0010

Project Officer(s): CHU, LILY
CHU, LILY Y.

Dates of Service: From: 10/11/2003 To: 01/28/2005

Summary of Service:

Total Costs: $14,906.85

| Voucher Number | Voucher Date | Voucher Amount | Treasury Schedule Number | and Date | Site Amount | Annual Allocation |
|---|---|---|---|---|---|---|
| 26845 | 11/14/2003 | 65,930.19 | R4127 | 12/11/2003 | 789.81 | 144.49 |
| 26846 | 12/12/2003 | 27,112.25 | R4182 | 01/08/2004 | 9,265.48 | 1,695.03 |
| 26847 | 01/09/2004 | 33,948.11 | R4231 | 02/06/2004 | 715.83 | 130.95 |
| 26848 | 02/27/2004 | 28,089.74 | R4324 | 03/25/2004 | 105.76 | 19.35 |
| 26850 | 04/07/2004 | 56,238.35 | R4387 | 05/05/2004 | 424.49 | 77.66 |
| 26851 | 04/30/2004 | 68,454.05 | R4429 | 05/27/2004 | 27.51 | 5.03 |
| 26852 | 06/10/2004 | 63,681.69 | R4506 | 07/08/2004 | 42.36 | 7.75 |
| 26861 | 01/19/2005 | 6,341.26 | R5281 | 02/17/2005 | 1,316.32 | 240.81 |
| 26862 | 02/22/2005 | 8,859.68 | R5347 | 03/23/2005 | -86.04 | -15.74 |
| | | | | Total: | $12,601.52 | $2,305.33 |

Certified By Financial Management Office

Contract Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE
COSTS FROM 10/01/1980 THROUGH 05/31/05

ENFORCEMENT SUPPORT SERVICES (ESS)

Contractor Name: SCIENCE APPLICATION INTERNATIONAL CORPS

EPA Contract Number: 68-S9-0010

Project Officer(s): CHU, LILY
CHU, LILY Y.

Dates of Service: From: 10/11/2003 To: 01/28/2005

Summary of Service:

Total Costs: $14,906.85

| Voucher Number | Schedule Number | Rate Type | Annual Allocation Rate |
|---|---|---|---|
| 26845 | R4127 | Class | 0.182940 |
| 26846 | R4182 | Class | 0.182940 |
| 26847 | R4231 | Class | 0.182940 |
| 26848 | R4324 | Class | 0.182940 |
| 26850 | R4387 | Class | 0.182940 |
| 26851 | R4429 | Class | 0.182940 |
| 26852 | R4506 | Class | 0.182940 |
| 26861 | R5281 | Class | 0.182940 |
| 26862 | R5347 | Class | 0.182940 |

Certified By Financial Management Office

Contract Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE
COSTS FROM 10/01/1980 THROUGH 05/31/05

ENFORCEMENT SUPPORT SERVICES (ESS)

Contractor Name: TOEROEK ASSOCIATES, INC.

EPA Contract Number: 68-W9-9050

Project Officer(s): POKORNY, CAROL

Dates of Service: From: 06/01/2004 To: 06/30/2004

Summary of Service:

Total Costs: $2,148.70

| Voucher Number | Voucher Date | Voucher Amount | Treasury Schedule Number | and Date | Site Amount | Annual Allocation |
|---|---|---|---|---|---|---|
| 71 | 07/14/2004 | 93,731.56 | R4565 | 08/10/2004 | 1,718.52 | 430.18 |
| | | | | Total: | $1,718.52 | $430.18 |

Certified By Financial Management Office

Contract Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE
COSTS FROM 10/01/1980 THROUGH 05/31/05

ENFORCEMENT SUPPORT SERVICES (ESS)

| | |
|---|---|
| Contractor Name: | TOEROEK ASSOCIATES, INC. |
| EPA Contract Number: | 68-W9-9050 |
| Project Officer(s): | POKORNY, CAROL |
| Dates of Service: | From: 06/01/2004 To: 06/30/2004 |
| Summary of Service: | |
| Total Costs: | $2,148.70 |

| Voucher Number | Schedule Number | Rate Type | Annual Allocation Rate |
|---|---|---|---|
| 71 | R4565 | Provisional | 0.250322 |

Certified By Financial Management Office

Contract Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE
COSTS FROM 10/01/1980 THROUGH 05/31/05

INTERAGENCY AGREEMENT (IAG)

Federal Agency: DEPARTMENT OF TRANSPORTATION

IAG Number: DW69953792

Project Officer(s): ZIMMERMAN, CHARLES

Dates of Service: From: To:

Summary of Service:

Total Costs: $499,154.83

| Voucher Number | Voucher Date | Voucher Amount | Treasury Schedule Number and Date | | Site Amount |
|---|---|---|---|---|---|
| 03801368 | 02/19/2004 | 300,000.00 | 270423203 | 04/12/2004 | 41,502.00 |
| 03801407 | 02/24/2004 | 200,000.00 | 270423377 | 05/06/2004 | 64,712.00 |
| 03801629 | 04/14/2004 | 1,075,339.49 | 270424799 | 06/03/2004 | 362,433.83 |
| 03802499 | 02/15/2005 | 200,000.00 | 270532288 | 05/18/2005 | 30,507.00 |
| | | | | Total: | $499,154.83 |

Certified By Financial Management Office

EPA Indirect Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

| Fiscal Year | Direct Costs | Indirect Rate( %) | Indirect Costs |
|---|---|---|---|
| 2003 | 18,951.45 | 37.12% | 7,034.78 |
| 2004 | 1,351,377.73 | 37.12% | 501,631.49 |
| 2005 | 336,376.55 | 37.12% | 124,862.95 |
| | 1,706,705.73 | | |
| Total EPA Indirect Costs | | | $633,529.22 |

Certified By Financial Management Office

EPA Indirect Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

## PAYROLL DIRECT COSTS

| Employee Name | Fiscal Year | Pay Period | Payroll Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|
| ACKERMAN, JOYCE MARYMEE | 2003 | 08 | 55.61 | 37.12% | 20.64 |
| | | 10 | 281.26 | 37.12% | 104.40 |
| | | 11 | 28.12 | 37.12% | 10.44 |
| | | 13 | 28.14 | 37.12% | 10.45 |
| | | | 393.13 | | $145.93 |
| COHN, MATTHEW D. | 2003 | 24 | 550.46 | 37.12% | 204.33 |
| | | 27 | 114.54 | 37.12% | 42.52 |
| | | | 665.00 | | $246.85 |
| LAND, KELCEY YARBROUGH | 2003 | 24 | 49.65 | 37.12% | 18.43 |
| | | 25 | 49.65 | 37.12% | 18.43 |
| | | | 99.30 | | $36.86 |
| NICHOLS, FLOYD D. | 2003 | 15 | 924.44 | 37.12% | 343.15 |
| | | 16 | 380.64 | 37.12% | 141.29 |
| | | 17 | 380.97 | 37.12% | 141.42 |
| | | 18 | 1,643.76 | 37.12% | 610.16 |
| | | 19 | 1,415.02 | 37.12% | 525.26 |
| | | 20 | 544.25 | 37.12% | 202.03 |
| | | 21 | 1,088.20 | 37.12% | 403.94 |
| | | 23 | 2,720.03 | 37.12% | 1,009.68 |
| | | 24 | 1,523.46 | 37.12% | 565.51 |
| | | 25 | 380.87 | 37.12% | 141.38 |
| | | 26 | 1,632.29 | 37.12% | 605.91 |
| | | 27 | 1,849.92 | 37.12% | 686.69 |
| | | | 14,483.85 | | $5,376.42 |
| SHIP, JAYME | 2003 | 24 | 550.14 | 37.12% | 204.21 |

Certified By Financial Management Office

EPA Indirect Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

## PAYROLL DIRECT COSTS

| Employee Name | Fiscal Year | Pay Period | Payroll Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|
| SHIP, JAYME | 2003 | 26 | 137.53 | 37.12% | 51.05 |
| | | | 687.67 | | $255.26 |
| SISK, RICHARD L | 2003 | 10 | 208.88 | 37.12% | 77.54 |
| | | 11 | 59.68 | 37.12% | 22.15 |
| | | | 268.56 | | $99.69 |
| Total Fiscal Year 2003 Payroll Direct Costs: | | | 16,597.51 | | $6,161.01 |

## TRAVEL DIRECT COSTS

| Traveler/Vendor Name | Travel Number | Treasury Schedule Date | Travel Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|
| NICHOLS, FLOYD D. | TM0105616 | 04/23/2003 | 323.26 | 37.12% | 119.99 |
| | TM0112491 | 06/06/2003 | 450.19 | 37.12% | 167.11 |
| | TM0127744 | 07/11/2003 | 441.10 | 37.12% | 163.74 |
| | TM0134970 | 08/19/2003 | 344.16 | 37.12% | 127.75 |
| | TM0136653 | 08/28/2003 | 460.30 | 37.12% | 170.86 |
| | TM0142767 | 09/19/2003 | 334.93 | 37.12% | 124.32 |
| | | | 2,353.94 | | $873.77 |
| Total Fiscal Year 2003 Travel Direct Costs: | | | 2,353.94 | | $873.77 |
| Total Fiscal Year 2003: | | | 18,951.45 | | $7,034.78 |

Certified By Financial Management Office

EPA Indirect Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE
COSTS FROM 10/01/1980 THROUGH 05/31/05

## PAYROLL DIRECT COSTS

| Employee Name | Fiscal Year | Pay Period | Payroll Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|
| BROSTE, DAVID L | 2004 | 03 | 223.55 | 37.12% | 82.98 |
| | | 04 | 298.06 | 37.12% | 110.64 |
| | | 05 | 149.03 | 37.12% | 55.32 |
| | | 07 | 347.68 | 37.12% | 129.06 |
| | | 08 | 198.68 | 37.12% | 73.75 |
| | | 09 | 127.46 | 37.12% | 47.31 |
| | | 10 | 50.99 | 37.12% | 18.93 |
| | | 11 | 254.92 | 37.12% | 94.63 |
| | | 12 | 203.93 | 37.12% | 75.70 |
| | | 13 | 50.99 | 37.12% | 18.93 |
| | | 14 | 50.99 | 37.12% | 18.93 |
| | | 15 | 312.30 | 37.12% | 115.93 |
| | | 16 | 104.10 | 37.12% | 38.64 |
| | | 18 | 26.02 | 37.12% | 9.66 |
| | | 20 | 52.05 | 37.12% | 19.32 |
| | | 23 | 52.05 | 37.12% | 19.32 |
| | | | 2,502.80 | | $929.05 |
| CHIPP, WENDY N. | 2004 | 03 | 287.55 | 37.12% | 106.74 |
| | | | 287.55 | | $106.74 |
| COHN, MATTHEW D. | 2004 | 03 | 245.48 | 37.12% | 91.12 |
| | | 04 | 81.85 | 37.12% | 30.38 |
| | | 05 | 65.45 | 37.12% | 24.30 |
| | | 06 | 180.03 | 37.12% | 66.83 |
| | | 08 | 309.63 | 37.12% | 114.93 |
| | | 09 | 351.94 | 37.12% | 130.64 |
| | | 10 | 703.89 | 37.12% | 261.28 |
| | | 11 | 492.70 | 37.12% | 182.89 |
| | | 12 | 598.29 | 37.12% | 222.09 |
| | | 14 | 739.06 | 37.12% | 274.34 |
| | | 15 | 1,654.15 | 37.12% | 614.02 |

Certified By Financial Management Office

EPA Indirect Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

## PAYROLL DIRECT COSTS

| Employee Name | Fiscal Year | Pay Period | Payroll Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|
| COHN, MATTHEW D. | 2004 | 16 | 1,438.39 | 37.12% | 533.93 |
| | | 18 | 1,006.88 | 37.12% | 373.75 |
| | | 19 | 143.84 | 37.12% | 53.39 |
| | | 20 | 503.44 | 37.12% | 186.88 |
| | | 21 | 107.88 | 37.12% | 40.05 |
| | | 23 | 71.92 | 37.12% | 26.70 |
| | | 24 | 71.92 | 37.12% | 26.70 |
| | | 25 | 71.92 | 37.12% | 26.70 |
| | | | 8,838.66 | | $3,280.92 |
| GILBERT, JOHN M. | 2004 | 14 | 2,764.39 | 37.12% | 1,026.14 |
| | | 17 | 2,834.22 | 37.12% | 1,052.06 |
| | | | 5,598.61 | | $2,078.20 |
| LAND, KELCEY YARBROUGH | 2004 | 03 | 124.12 | 37.12% | 46.07 |
| | | 04 | 49.65 | 37.12% | 18.43 |
| | | 06 | 74.48 | 37.12% | 27.65 |
| | | 08 | 99.29 | 37.12% | 36.86 |
| | | 10 | 152.60 | 37.12% | 56.65 |
| | | 14 | 406.94 | 37.12% | 151.06 |
| | | 15 | 311.61 | 37.12% | 115.67 |
| | | 16 | 51.94 | 37.12% | 19.28 |
| | | 17 | 103.87 | 37.12% | 38.56 |
| | | 19 | 77.90 | 37.12% | 28.92 |
| | | 23 | 51.94 | 37.12% | 19.28 |
| | | | 1,504.34 | | $558.43 |
| LANGE, ALAN U. | 2004 | 15 | 113.47 | 37.12% | 42.12 |

Certified By Financial Management Office

EPA Indirect Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

## PAYROLL DIRECT COSTS

| Employee Name | Fiscal Year | Pay Period | Payroll Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|
| LANGE, ALAN U. | 2004 | 16 | 1,647.30 | 37.12% | 611.48 |
| | | | 1,760.77 | | $653.60 |
| MANLET, NANCY L. | 2004 | 13 | 185.01 | 37.12% | 68.68 |
| | | 14 | 308.36 | 37.12% | 114.46 |
| | | | 493.37 | | $183.14 |
| MILLER, AUBREY | 2004 | FB | 463.44 | 37.12% | 172.03 |
| | | | 463.44 | | $172.03 |
| MUELLER, NANCY H | 2004 | 03 | 684.34 | 37.12% | 254.03 |
| | | 04 | 44.15 | 37.12% | 16.39 |
| | | 07 | 22.07 | 37.12% | 8.19 |
| | | 08 | 22.07 | 37.12% | 8.19 |
| | | 10 | 90.27 | 37.12% | 33.51 |
| | | 13 | 45.14 | 37.12% | 16.76 |
| | | 14 | 22.57 | 37.12% | 8.38 |
| | | 15 | 46.11 | 37.12% | 17.12 |
| | | 16 | 23.05 | 37.12% | 8.56 |
| | | 24 | 46.11 | 37.12% | 17.12 |
| | | | 1,045.88 | | $388.25 |
| MYERS, CRAIG | 2004 | 05 | 50.75 | 37.12% | 18.84 |
| | | 06 | 826.72 | 37.12% | 306.88 |
| | | 07 | 25.36 | 37.12% | 9.41 |
| | | 08 | 25.37 | 37.12% | 9.42 |
| | | 10 | 26.04 | 37.12% | 9.67 |
| | | 11 | 381.95 | 37.12% | 141.78 |
| | | 12 | 26.04 | 37.12% | 9.67 |
| | | 13 | 468.74 | 37.12% | 174.00 |

Certified By Financial Management Office

EPA Indirect Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE
COSTS FROM 10/01/1980 THROUGH 05/31/05

PAYROLL DIRECT COSTS

| Employee Name | Fiscal Year | Pay Period | Payroll Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|
| MYERS, CRAIG | 2004 | 14 | 690.10 | 37.12% | 256.17 |
| | | 15 | 2,076.66 | 37.12% | 770.86 |
| | | 17 | 411.47 | 37.12% | 152.74 |
| | | 18 | 2,393.01 | 37.12% | 888.29 |
| | | 19 | 740.02 | 37.12% | 274.70 |
| | | 20 | 1,636.23 | 37.12% | 607.37 |
| | | | 9,778.46 | | $3,629.80 |
| NICHOLS, FLOYD D. | 2004 | 01 | 468.37 | 37.12% | 173.86 |
| | | 02 | 761.72 | 37.12% | 282.75 |
| | | 03 | 3,819.74 | 37.12% | 1,417.89 |
| | | 04 | 435.27 | 37.12% | 161.57 |
| | | 05 | 979.36 | 37.12% | 363.54 |
| | | 06 | 326.46 | 37.12% | 121.18 |
| | | 07 | 652.88 | 37.12% | 242.35 |
| | | 08 | 707.27 | 37.12% | 262.54 |
| | | 09 | 893.08 | 37.12% | 331.51 |
| | | 10 | 1,501.89 | 37.12% | 557.50 |
| | | 11 | 1,283.80 | 37.12% | 476.55 |
| | | 12 | 1,116.35 | 37.12% | 414.39 |
| | | 13 | 1,655.58 | 37.12% | 614.55 |
| | | 16 | 1,310.91 | 37.12% | 486.61 |
| | | 17 | 2,800.30 | 37.12% | 1,039.47 |
| | | 18 | 5,391.13 | 37.12% | 2,001.19 |
| | | 20 | 3,081.60 | 37.12% | 1,143.89 |
| | | 21 | 1,082.93 | 37.12% | 401.98 |
| | | 22 | 1,538.90 | 37.12% | 571.24 |
| | | 23 | 854.95 | 37.12% | 317.36 |
| | | 24 | 2,600.57 | 37.12% | 965.33 |
| | | 25 | 2,770.08 | 37.12% | 1,028.25 |

Certified By Financial Management Office

EPA Indirect Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

## PAYROLL DIRECT COSTS

| Employee Name | Fiscal Year | Pay Period | Payroll Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|
| NICHOLS, FLOYD D. | 2004 | 26 | 869.30 | 37.12% | 322.68 |
| | | | 36,902.44 | | $13,698.18 |
| PENNOCK, SONYA S | 2004 | 18 | 63.08 | 37.12% | 23.42 |
| | | 21 | 31.54 | 37.12% | 11.71 |
| | | | 94.62 | | $35.13 |
| POKORNY, CAROL J. | 2004 | 18 | 55.52 | 37.12% | 20.61 |
| | | 19 | 27.76 | 37.12% | 10.30 |
| | | 22 | 41.65 | 37.12% | 15.46 |
| | | 23 | 53.57 | 37.12% | 19.89 |
| | | 26 | 13.42 | 37.12% | 4.98 |
| | | | 191.92 | | $71.24 |
| PRESSLEY, CHERYL | 2004 | 01 | 51.46 | 37.12% | 19.10 |
| | | 02 | 205.73 | 37.12% | 76.37 |
| | | 03 | 25.71 | 37.12% | 9.54 |
| | | | 282.90 | | $105.01 |
| ROMERO, DAVID | 2004 | 16 | 1,510.79 | 37.12% | 560.81 |
| | | | 1,510.79 | | $560.81 |
| ROQUEMORE, SHEILA R. | 2004 | 02 | 16.73 | 37.12% | 6.21 |
| | | | 16.73 | | $6.21 |
| Total Fiscal Year 2004 Payroll Direct Costs: | | | 71,273.28 | | $26,456.74 |

Certified By Financial Management Office

EPA Indirect Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

TRAVEL DIRECT COSTS

| Traveler/Vendor Name | Travel Number | Treasury Schedule Date | Travel Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|
| CHIPP, WENDY N. | TM0162298 | 11/21/2003 | 278.18 | 37.12% | 103.26 |
| | | | 278.18 | | $103.26 |
| GILBERT, JOHN M. | TM0194074 | 04/02/2004 | 100.00 | 37.12% | 37.12 |
| | TM0215428 | 05/20/2004 | 100.00 | 37.12% | 37.11 |
| | | | 200.00 | | $74.23 |
| LANGE, ALAN U. | TM0206800 | 04/30/2004 | 786.10 | 37.12% | 291.80 |
| | | | 786.10 | | $291.80 |
| MILLER, AUBREY | TM0187203 | 03/05/2004 | 288.45 | 37.12% | 107.08 |
| | | | 288.45 | | $107.08 |
| MUELLER, NANCY H | TM0161787 | 11/05/2003 | 243.90 | 37.12% | 90.53 |
| | | | 243.90 | | $90.53 |
| MYERS, CRAIG | TM0171158 | 01/08/2004 | 700.72 | 37.12% | 260.09 |
| | TM0180474 | 03/09/2004 | 79.70 | 37.12% | 29.58 |
| | TM0194126 | 04/06/2004 | 479.25 | 37.12% | 177.90 |
| | TM0202419 | 05/11/2004 | 1,005.20 | 37.12% | 373.13 |
| | TM0210855 | 05/14/2004 | 1,197.05 | 37.12% | 444.34 |
| | TM0215380 | 06/16/2004 | 967.19 | 37.12% | 359.02 |
| | TM0220608 | 06/18/2004 | 1,394.45 | 37.12% | 517.62 |
| | TM0224630 | 07/19/2004 | 1,163.30 | 37.12% | 431.81 |
| | | | 6,986.86 | | $2,593.49 |
| NATIONSBANK OF DELAWARE N.A. | TM0194074 | 04/02/2004 | 1,246.44 | 37.12% | 462.68 |

Certified By Financial Management Office

EPA Indirect Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

## TRAVEL DIRECT COSTS

| Traveler/Vendor Name | Travel Number | Treasury Schedule Date | Travel Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|
| NATIONSBANK OF DELAWARE N.A. | TM0215428 | 05/20/2004 | 1,320.62 | 37.12% | 490.21 |
| | | | 2,567.06 | | $952.89 |
| NICHOLS, FLOYD D. | TM0142776 | 10/09/2003 | 707.97 | 37.12% | 262.80 |
| | TM0168305 | 01/05/2004 | 491.25 | 37.12% | 182.34 |
| | TM0179568 | 02/05/2004 | 536.18 | 37.12% | 199.03 |
| | TM0182027 | 02/23/2004 | 494.77 | 37.12% | 183.66 |
| | TM0182418 | 02/26/2004 | 480.01 | 37.12% | 178.19 |
| | TM0194122 | 04/26/2004 | 427.41 | 37.12% | 158.65 |
| | TM0208958 | 06/09/2004 | 670.14 | 37.12% | 248.76 |
| | TM0215158 | 06/30/2004 | 1,440.86 | 37.12% | 534.85 |
| | TM0234362 | 07/28/2004 | 359.45 | 37.12% | 133.43 |
| | TM0227497 | 07/29/2004 | 536.13 | 37.12% | 199.01 |
| | TM0241158 | 08/23/2004 | 386.54 | 37.12% | 143.49 |
| | TM0246135 | 09/22/2004 | 544.93 | 37.12% | 202.28 |
| | TM0246151 | 09/22/2004 | 497.73 | 37.12% | 184.76 |
| | TM0245114 | 09/22/2004 | 493.79 | 37.12% | 183.30 |
| | | | 8,067.16 | | $2,994.55 |
| ROMERO, DAVID | TM0207778 | 04/30/2004 | 771.67 | 37.12% | 286.45 |
| | | | 771.67 | | $286.45 |
| Total Fiscal Year 2004 Travel Direct Costs: | | | 20,189.38 | | $7,494.28 |

## OTHER DIRECT COSTS

| Contract, IAG, SCA, Misc.NO | Voucher Number | Treasury Schedule Date | Site Amount | Annual/SMO Allocation Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|---|
| 68-S9-0010 | 26845 | 12/11/2003 | 789.81 | 144.49 | 37.12% | 346.81 |
| | 26846 | 01/08/2004 | 9,265.48 | 1,695.03 | 37.12% | 4,068.54 |

Certified By Financial Management Office

EPA Indirect Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

OTHER DIRECT COSTS

| Contract, IAG, SCA, Misc.NO | Voucher Number | Treasury Schedule Date | Site Amount | Annual/SMO Allocation Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|---|
| 68-S9-0010 | 26847 | 02/06/2004 | 715.83 | 130.95 | 37.12% | 314.32 |
| | 26848 | 03/25/2004 | 105.76 | 19.35 | 37.12% | 46.44 |
| | 26850 | 05/05/2004 | 424.49 | 77.66 | 37.12% | 186.40 |
| | 26851 | 05/27/2004 | 27.51 | 5.03 | 37.12% | 12.08 |
| | 26852 | 07/08/2004 | 42.36 | 7.75 | 37.12% | 18.60 |
| | | | 11,371.24 | 2,080.26 | | $4,993.19 |
| 68-W0-1053 | 8042-01 | 06/03/2004 | 74,187.15 | 0.00 | 37.12% | 27,538.27 |
| | 8042-02 | 07/15/2004 | 390,811.88 | 0.00 | 37.12% | 145,069.37 |
| | 8042-03 | 09/08/2004 | 310,668.01 | 0.00 | 37.12% | 115,319.97 |
| | | | 775,667.04 | 0.00 | | $287,927.61 |
| 68-W9-9050 | 71 | 08/10/2004 | 1,718.52 | 430.18 | 37.12% | 797.60 |
| | | | 1,718.52 | 430.18 | | $797.60 |
| DW69953792 | 03801368 | 04/12/2004 | 30,000.00 | 0.00 | 37.12% | 11,136.00 |
| | | | 11,502.00 | 0.00 | 37.12% | 4,269.54 |
| | 03801407 | 05/06/2004 | 64,712.00 | 0.00 | 37.12% | 24,021.09 |
| | 03801629 | 06/03/2004 | 29,655.00 | 0.00 | 37.12% | 11,007.94 |
| | | | 332,778.83 | 0.00 | 37.12% | 123,527.50 |
| | | | 468,647.83 | 0.00 | | $173,962.07 |
| Total Fiscal Year 2004 Other Direct Costs: | | | 1,257,404.63 | 2,510.44 | | $467,680.47 |
| Total Fiscal Year 2004: | | | 1,351,377.73 | | | $501,631.49 |

Certified By Financial Management Office

EPA Indirect Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE
COSTS FROM 10/01/1980 THROUGH 05/31/05

PAYROLL DIRECT COSTS

| Employee Name | Fiscal Year | Pay Period | Payroll Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|
| ACKERMAN, JOYCE MARYMEE | 2005 | 10 | 603.82 | 37.12% | 224.14 |
| | | 11 | 29.80 | 37.12% | 11.06 |
| | | 12 | 415.83 | 37.12% | 154.36 |
| | | 13 | 147.91 | 37.12% | 54.90 |
| | | 16 | 207.93 | 37.12% | 77.18 |
| | | 17 | 29.76 | 37.12% | 11.05 |
| | | 18 | 59.41 | 37.12% | 22.05 |
| | | | 1,494.46 | | $554.74 |
| BOHAN, SUZANNE J. | 2005 | 07 | 247.02 | 37.12% | 91.69 |
| | | 08 | 185.29 | 37.12% | 68.78 |
| | | | 432.31 | | $160.47 |
| BROSTE, DAVID L | 2005 | 03 | 212.41 | 37.12% | 78.85 |
| | | 04 | 106.20 | 37.12% | 39.42 |
| | | 07 | 106.20 | 37.12% | 39.42 |
| | | | 424.81 | | $157.69 |
| COHN, MATTHEW D. | 2005 | 03 | 137.43 | 37.12% | 51.01 |
| | | 09 | 37.49 | 37.12% | 13.92 |
| | | 11 | 74.98 | 37.12% | 27.83 |
| | | 12 | 149.93 | 37.12% | 55.65 |
| | | 13 | 522.70 | 37.12% | 194.03 |
| | | 14 | 224.89 | 37.12% | 83.48 |
| | | 16 | 37.49 | 37.12% | 13.92 |
| | | 17 | 674.70 | 37.12% | 250.45 |
| | | 18 | 712.20 | 37.12% | 264.37 |
| | | | 2,571.81 | | $954.66 |

Certified By Financial Management Office

EPA Indirect Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE
COSTS FROM 10/01/1980 THROUGH 05/31/05

PAYROLL DIRECT COSTS

| Employee Name | Fiscal Year | Pay Period | Payroll Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|
| GOLDEN, DANIELA D | 2005 | 13 | 66.78 | 37.12% | 24.79 |
| | | | 66.78 | | $24.79 |
| LAND, KELCEY YARBROUGH | 2005 | 06 | 206.86 | 37.12% | 76.79 |
| | | 12 | 164.51 | 37.12% | 61.07 |
| | | 13 | 109.67 | 37.12% | 40.71 |
| | | 17 | 109.67 | 37.12% | 40.71 |
| | | 18 | 164.51 | 37.12% | 61.07 |
| | | | 755.22 | | $280.35 |
| MUELLER, NANCY H | 2005 | 13 | 24.52 | 37.12% | 9.10 |
| | | | 24.52 | | $9.10 |
| MYERS, CRAIG | 2005 | 03 | 644.52 | 37.12% | 239.25 |
| | | | 644.52 | | $239.25 |
| NICHOLS, FLOYD D. | 2005 | 02 | 2,595.63 | 37.12% | 963.50 |
| | | 03 | 1,480.50 | 37.12% | 549.56 |
| | | 04 | 2,427.80 | 37.12% | 901.20 |
| | | 05 | 2,120.52 | 37.12% | 787.14 |
| | | 06 | 3,036.52 | 37.12% | 1,127.16 |
| | | 07 | 3,334.90 | 37.12% | 1,237.91 |
| | | 08 | 2,686.27 | 37.12% | 997.14 |
| | | 09 | 514.66 | 37.12% | 191.04 |
| | | 10 | 1,109.44 | 37.12% | 411.82 |
| | | 11 | 443.91 | 37.12% | 164.78 |
| | | | 19,750.15 | | $7,331.25 |
| PADILLA, LAURIE A. | 2005 | 08 | 526.39 | 37.12% | 195.40 |

Certified By Financial Management Office

EPA Indirect Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

## PAYROLL DIRECT COSTS

| Employee Name | Fiscal Year | Pay Period | Payroll Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|
| PADILLA, LAURIE A. | 2005 | 09 | 219.05 | 37.12% | 81.31 |
| | | 10 | 146.03 | 37.12% | 54.21 |
| | | | 891.47 | | $330.92 |
| PENNOCK, SONYA S | 2005 | 18 | 164.13 | 37.12% | 60.93 |
| | | | 164.13 | | $60.93 |
| POKORNY, CAROL J. | 2005 | 12 | 13.97 | 37.12% | 5.19 |
| | | | 13.97 | | $5.19 |
| PRESSLEY, CHERYL | 2005 | 09 | 56.30 | 37.12% | 20.90 |
| | | 10 | 70.37 | 37.12% | 26.12 |
| | | | 126.67 | | $47.02 |
| Total Fiscal Year 2005 Payroll Direct Costs: | | | 27,360.82 | | $10,156.36 |

## TRAVEL DIRECT COSTS

| Traveler/Vendor Name | Travel Number | Treasury Schedule Date | Travel Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|
| ACKERMAN, JOYCE MARYMEE | TM0288854 | 02/23/2005 | 261.05 | 37.12% | 96.90 |
| | | | 261.05 | | $96.90 |
| NATIONSBANK OF DELAWARE N.A. | TM0260812 | 11/16/2004 | 532.07 | 37.12% | 197.50 |
| | | | 532.07 | | $197.50 |
| NICHOLS, FLOYD D. | TM0257124 | 10/28/2004 | 512.90 | 37.12% | 190.39 |
| | TM0257132 | 11/08/2004 | 490.77 | 37.12% | 182.17 |

Certified By Financial Management Office

EPA Indirect Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE
COSTS FROM 10/01/1980 THROUGH 05/31/05

## TRAVEL DIRECT COSTS

| Traveler/Vendor Name | Travel Number | Treasury Schedule Date | Travel Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|
| NICHOLS, FLOYD D. | TM0257139 | 11/09/2004 | 459.81 | 37.12% | 170.67 |
| | TM0268358 | 11/26/2004 | 507.73 | 37.12% | 188.46 |
| | TM0269829 | 12/16/2004 | 765.81 | 37.12% | 284.26 |
| | TM0269806 | 12/16/2004 | 479.87 | 37.12% | 178.13 |
| | TM0275290 | 12/30/2004 | 518.85 | 37.12% | 192.59 |
| | TM0275299 | 01/14/2005 | 521.17 | 37.12% | 193.45 |
| | TM0279034 | 01/18/2005 | 439.57 | 37.12% | 163.17 |
| | TM0285606 | 01/28/2005 | 75.75 | 37.12% | 28.12 |
| | TM0268471 | 01/28/2005 | 518.20 | 37.12% | 192.35 |
| | TM0288857 | 02/23/2005 | 343.68 | 37.12% | 127.57 |
| | | | 5,634.11 | | $2,091.33 |
| Total Fiscal Year 2005 Travel Direct Costs: | | | 6,427.23 | | $2,385.73 |

## OTHER DIRECT COSTS

| Contract, IAG, SCA, Misc.NO | Voucher Number | Treasury Schedule Date | Site Amount | Annual/SMO Allocation Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|---|
| 68-S9-0010 | 26861 | 02/17/2005 | 1,316.32 | 240.81 | 37.12% | 578.01 |
| | 26862 | 03/23/2005 | -86.04 | -15.74 | 37.12% | -37.78 |
| | | | 1,230.28 | 225.07 | | $540.23 |
| 68-W0-1053 | 8042-04 | 10/12/2004 | 163,672.59 | 0.00 | 37.12% | 60,755.27 |
| | 8042-05 | 11/09/2004 | 75,576.37 | 0.00 | 37.12% | 28,053.95 |
| | 8042-06 | 12/28/2004 | 21,331.66 | 0.00 | 37.12% | 7,918.31 |
| | 8042-07 | 05/02/2005 | 8,814.22 | 0.00 | 37.12% | 3,271.84 |
| | 8042-08 | 05/18/2005 | 1,231.31 | 0.00 | 37.12% | 457.06 |
| | | | 270,626.15 | 0.00 | | $100,456.43 |

Certified By Financial Management Office

EPA Indirect Costs

VERMICULITE INTERMOUNTAIN, UT SITE ID = 08 GA

ALL INCLUSIVE

COSTS FROM 10/01/1980 THROUGH 05/31/05

OTHER DIRECT COSTS

| Contract, IAG, SCA, Misc.NO | Voucher Number | Treasury Schedule Date | Site Amount | Annual/SMO Allocation Costs | Ind. Rate (%) | Indirect Costs |
|---|---|---|---|---|---|---|
| DW69953792 | 03802499 | 05/18/2005 | 30,507.00 | 0.00 | 37.12% | 11,324.20 |
| | | | 30,507.00 | 0.00 | | $11,324.20 |
| Total Fiscal Year 2005 Other Direct Costs: | | | 302,363.43 | 225.07 | | $112,320.86 |
| Total Fiscal Year 2005: | | | 336,376.55 | | | $124,862.95 |
| Total EPA Indirect Costs | | | | | | $633,529.22 |

# Enclosure 2

United States
Environmental Protection Agency
Washington, DC 20460

# DELIVERY ORDER FOR EMERGENCY RESPONSE CLEANUP SERVICES

*(This delivery order is issued subject to all terms and conditions of the contract identified in Block 2)*

1. DATE OF ORDER:

2. CONTRACT NUMBER: 68-W-01-053

4. TIME OF INITIAL ORDER: *(If initial order was verbal)* *(Specify Time Zone)*

3. ORDER NUMBER: 053-08-042

5. DELIVERY ORDER CEILING AMOUNT: *(Obligated Amt)* $400,000.00

6a. ISSUED TO: CONTRACTOR *(Name, Address, Zip Code)*
Environmental Restoration, LLC
16294 Westwoods Business Park Drive
St. Louis, Missouri 63021

7a. ISSUED BY: ORDERING OFFICE *(Name,Address,ZipCode)*
Lisa Walker, CO
999 18th St., Denver, Colorado 80202-2405

6b. PROGRAM MANAGER: *(Name and Phone Number)*
Dennis Greaney, ZPM (636) 227- 7477

7b.EPA REGION/USCG DISTRICT VIII

7c. ZONE
Region VIII

6c. RESPONSE MANAGER: *(Name and Phone Number)*
Byron Hartman , Sr. RM (636) 227-7477

7d. ON-SCENE COORDINATOR *(Name and Phone Number)*
Floyd Nichols, OSC

8. RESPONSE LOCATION: *(Site Name and/or Address, Zip Code)*
Vermiculite Intermountain Site
Salt Lake City, Salt Lake County, Utah

9. CONTRACTOR REQUIRED ON SITE: *(Date and Time)* *(Specify Time Zone)*
04/16/04 @ 0700 hrs

10. REQUIRED WORK COMPLETION DATE:
08/31/04

11. STATEMENT OF WORK *(The Contractor shall furnish necessary personnel, materials, services, facilities, and otherwise do all things Necessary for, or incident to, the performance of the work set forth* below:)

See Attached - SOW

## 12. ACCOUNTING AND APPROPRIATION DATA

| Line | DCN (Max 6) | Budget/FYs (Max 4) | Appropriation Code (Max 6) | Budget Org/Code (Max 7) | Program Element (Max 9) | Object/Class (Max 4) |
|---|---|---|---|---|---|---|
| 1 | LRV030 | 03 | T | 8AL0E | 50102D | 25.05 |
| 2 | | | | | | |
| 3 | | | | | | |

| Line | Amount (Dollar) | (Cents) | Site Project (Max 8) | Cost Org/Code (Max 7) |
|---|---|---|---|---|
| 1 | $400,000 | 00 | 08WQRV00 | C001 |
| 2 | | | (08GARV00) | |
| 3 | | | | |

SFO: 22 (Max 2)

13. ORDERING OFFICER:

| NAME/TITLE: | *SIGNATURE:* | *DATE:* |
|---|---|---|
| Lisa Walker, CO | | |

EPA Form 1900-59 (Rev.7-94)

Region 8 ERRS I - Environmental Restoration, L.L.C.
Delivery Order No.: 053-08-042, Vermiculite Intermountain Site
Salt Lake City, Salt Lake County, Utah

## I. GENERAL PROVISIONS

1. Provide for detailed 'Site Work Plan.' A detailed project schedule shall be included in the work plan.

2. Within the Work Plan, provide for a detailed Site Health and Safety Plan (HASP). The following components shall be featured within the HASP:

   a) establish appropriate work, support, and exclusion areas as well as provide for managing necessary positive and negative air flow and filtration units;
   b) establish and implement appropriate personnel management and safety features and provide for personnel decontamination;
   c) utilize appropriate dust-control measures (i.e., encapsulation, containment, water spray, etc.), as needed, to prevent off-site release of Asbestos Containing Materials (ACM), also known as Libby Amphibole structures (LA);
   d) provide for adequate decontamination of all workers, debris, equipment, and abatement-related items and material leaving the site.

3. Provide appropriate disposal of all LA cleanup-related debris, dust, and/or soils removed from the site.

4. Provide cleanup service until clearance confirmation samples for any particular isolation/exclusion area are reported as non-detect ('ND') for LA.

5. Provide for the application of Service Contract and Davis-Bacon Act labor rates, as appropriate.

6. Provide all Site cost documentation within 90 days after demobilization date, with the exception of 'pending costs. Use RCMS Windows Version 2000 for site cost accounting purposes.

7. Provide a cleanup post-action summary report detailing all actions, including copies of all appropriate inventory and disposition sheets.

## II ARTISTIC PRINTING COMPANY PROPERTY

8. In consultation with the property owner, provide for the inventory and document of all no-value items that the owner would like disposed of with no compensation. As appropriate, inventory and appraise all items that seem to have a low value (in case it may be cost-effective to compensate for rather than decontaminate). Inventory and photo- and/or video-document all items of value on the premises (i.e. equipment, inventory, etc)

to document how well equipment is working, and the owner's consent to dispose. Prepare and document final inventory as accepted by the owner and OSC.

9. Provide temporary off-site storage space (i.e., secured warehouse) sufficient to house production feed stock (i.e., paper rolls, binding material, production-associated material and supplies) and finished product while the product awaits outgoing shipment. Temporary off-site storage space(s) should be made available to Artistic Printing between the time of initial ERRS mobilization until final clearance confirmation sampling is completed, plus an additional, short period of time so as to allow for return of the stored items to their original location inside the Artistic Printing building. Storage space will also be sufficient to accommodate temporary storage of items cleaned and removed from the building (see Item No. 11 below).

10. Provide temporary off-site office space sufficient to accommodate Artistic Printing's normal office staff and normal office operation for the same period of time as that specified in Item No. 9 above.

11. In consultation with the property owner, and as appropriate to any particular item, wet- and/or dry-wipe and HEPA-vacuum exterior surfaces of all items found inside the building. As appropriate, open and expose, then clean inside voids of such items, units, etc., which have been or were opened to the ambient building air after their arrival inside the building. As appropriate and before implementation, consult with the OSC any alternate 'cleaning and/or encapsulation' method(s) or technique(s) for any item found inside the building, or of any building feature. After clearance confirmation sampling demonstrates these items are 'ND' for LA, encapsulate the items. The items can then, as appropriate, be sealed in place or moved into temporary off-site storage.

12. Provide for cleaning of interior building features, moving all 'movable' items, as necessary, so as to enable reaching obstructed or obscured interior features. It may be necessary, or appropriate, to encapsulate (i.e., paint) unfinished building material (an 'un-cleanable surface').

13. Clear the building of any remaining abatement-related items, then restore business-related items, which were previously removed from the building, to a location suitable to the owner.

FRANK EDWARDS BUILDING PROPERTY

14. In consultation with the property owner, and as appropriate to any particular item, wet- and/or dry-wipe and HEPA-vacuum exterior surfaces of all items found inside the building. As appropriate, open and expose, then clean inside voids of such items, units, etc., which have been or were opened to the ambient building air after their arrival inside the building. As appropriate and before implementation, consult with the OSC any alternate 'cleaning and/or encapsulation' method(s) or technique(s) for any item found inside the building, or of any building feature. After clearance confirmation sampling

demonstrates these items are 'ND' for LA, encapsulate the items. The items can then, as appropriate, be sealed in place or moved into temporary off-site storage.

15. Provide for cleaning of interior building features, moving all 'movable' items, as necessary, so as to enable reaching obstructed or obscured interior features. It may be necessary, or appropriate, to encapsulate (i.e., paint) unfinished building material (an 'un-cleanable surface').

16. Clear the exclusion area of any remaining abatement-related items, then restore any items previously removed from the exclusion area to a location suitable to the owner.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

**MEMORANDUM**

TO: Lisa Walker, Contracting Officer
Region 8 ERRS I Contract

FROM: Mike Zimmerman, Project Officer
Region 8 ERRS I Contract

SUBJECT: Delivery Order No.: 053-08-042
Vermiculite Intermountain Site
Salt Lake City, Salt Lake County, Utah

DATE: June 1, 2004

It has come to our attention that additional funding is necessary for the response at Vermiculite Intermountain Site. Please add an additional $395,000 to Delivery Order No. 053-08-042. The new ceiling becomes $1,090,000. The origin of funding came from the following contract bulk obligation:

| DCN | BFYS | Appr. | Org. | Program Element | Site/Project | Cost Org | Obj Class | Amount | P/C |
|---|---|---|---|---|---|---|---|---|---|
| LRV030 | 03 | T | 8AL0E | 50102D | 08WQRV00 | C001 | 25.05 | $3,499,000 | C |

The Site identification number is 08GARV00. In advance, thank you for your assistance.

Attachment

cc: PO Files
Floyd Nichols, OSC

# Enclosure 3

WAF 19B – Planning/Oversight Support

**STATEMENT OF WORK**
**WORK AUTHORIZATION FORM 19B (WAF 19B) (02/13/04)**
**VERMICULITE INTERMOUNTAIN - LIBBY SISTER SITES – Salt Lake City 2**

**Background**

As part of their support to the Libby Asbestos Project - Libby Sister Sites, the Volpe Center manages and conducts technical tasks related to oversight of cleanup/remediation of contaminated soil and asbestos-contaminated materials (ACM). Cleanup is conducted by contractors working for Potentially Responsible Parties (PRPs) or by the Government through EPA's Removal Contractor.

**Tasks to be Performed**

The Volpe Center shall provide the personnel, materials and supplies to conduct the following tasks:

**Task 1. Sampling and Analysis.** Conduct sampling and analysis of various media, as necessary, related to the design and cleanup of contaminated sites, for general monitoring of sites, and to develop design documents, as necessary.

**Task 2. Work Plan.** Review, validate and coordinate the Work Plan (PRP or EPA prepared) for cleanup/remediation of the site.

**Task 3. Health and Safety Oversight.** Perform on-site health and safety inspections. Conduct on-site observations of cleanup/remediation activities for compliance with the Comprehensive Health and Safety Plan (HASP) and Work Plan. Conduct sampling and analysis of soil, air and personnel to ensure health and safety during and after cleanup/remediation. Perform surveys to document sampling locations for future analysis of contamination patterns and exposure.

**Task 4. Cleanup/Remediation Coordination, Oversight, and Administration.** Perform planning, coordination, and administrative functions required to prepare property owners, cleanup/remediation staff, and oversight staff for cleanup/remediation activities, and to facilitate successful project completion. Task includes all necessary meetings, documentation, validation, and reporting of results, expenses, and performance.

**Cost Estimate**

The estimated cost for conducting these tasks is provided on the coversheet for WAF 19B. The Volpe Center's detailed cost estimate is provided in Attachment 1. The estimated cost is highly dependant upon the schedule of the removal action. As required, the estimate will be modified and delivered to EPA Region 8.

WAF 19B – Planning/Oversight Support

**Period of Performance**

The period of performance for conducting these tasks I estimated at 85 days. The specific dates are provided on the coversheet for WAF 19B. Refer to Attachment 2 for a schedule of tasks.

**Deliverables**

The following deliverables are required as part of this WAF:

- Daily Site Updates
- Monthly Progress Report

The Volpe Center also provides support to EPA Region 8 on this WAF through contractor efforts (A/E and in-house contracts). Numerous deliverables provided to the Volpe Center through these contracts are also provided to EPA Region 8. These deliverables are tracked on a contract-by-contract basis and documentation of these deliverables is maintained in accordance with the terms and conditions of the IAG between EPA Region 8 and the Volpe Center.

**Concurrence**

EPA Region 8 and the Volpe Center have discussed this statement of work and mutually agree to its requirements, the estimated cost, and the schedule.

EPA Region 8 On Scene Coordinator

Floyd Nichols Date

Volpe Center Project Manager:

John McGuiggin 4/22/04
Date

# STATEMENT OF WORK
# VERMICULITE INTERMOUNTAIN
# LIBBY SISTER SITES – Salt Lake City 2
# LaQuinta – Frank Edwards Building (FEB)

## Background

As part of their support to the Libby Asbestos Project - Libby Sister Sites, EPA Region 8 and its contractors (Volpe Center and Environmental Restoration) manages the oversight and execution of cleanup/remediation of contaminated soil and asbestos-contaminated materials (ACM). The clean up at the Frank Edwards Building (FEB) will be performed by Environmental Restoration (ER) and air and dust sampling will be performed by a Volpe Center subcontractor CDM.

## Tasks to be Performed

EPA Region 8 will provide the personnel, materials and supplies to conduct the following tasks:

**Task 1. Sampling and Analysis.** Conduct sampling and analysis of background, ambient, personnel and clearance air as well as dust. The contaminant of concern is asbestos, more specifically Libby Amphibole (LA). Through investigation of the FEB, two types of asbestos have been identified at elevated levels – LA and chrysotile. LA has been found in the High Bay Building and Southern Building (Attachment 1). EPA and its contractors are only concerned with the abatement of LA. If the chrysotile or the building material containing the chrysotile is hindering the abatement of LA, then it too will be removed. However, note that EPA does not plan on removing the chrysotile so upon the demobilization of EPA and its contractors, elevated levels of chrysotile may remain.

**Task 2. Work Plan.** ER will perform the removal action. Their main action is to removal all LA from the building. All worked performed in the building, including set up, will be performed in Level C personal protection equipment (PPE) due to the elevated levels of chrysotile.

### 2.1 High Bay Building

#### 2.1.1 Removal

- Remove of all ceiling tiles
- Remove all NON-electrical wiring (network cables, phone lines, etc.)
- Remove of all carpeting and drapery
- Removal of non-structural temporary wall between High Bay and South building to allow for large machinery
- Wet wipe and HEPA vacuum of all surfaces.
- Encapsulation of porous surfaces that wipe down and vacuum is insufficient.

#### 2.1.2 Restoration

- Replace ceiling tiles in lower tier of drop ceiling
- Note: The structural integrity of the building will not be modified.

- Wiring, carpet, temporary wall and drapery will not be replaced as part of the restoration efforts.

**2.2 South Building**

**2.2.1 Removal**

- Remove of all ceiling tiles
- Remove all NON-electrical wiring (network cables, phone lines, etc.)
- Remove of all carpeting and drapery
- Remove all ceiling insulation
- Remove the temporary wall between the High Bay and South buildings and the temporary wall used as a partition in the western portion of the South building
- Wet wipe and HEPA vacuum of all surfaces.
- Encapsulation of porous surfaces that wipe down and vacuum is insufficient.

**2.2.2 Restoration**

- Replace ceiling tiles in lower tier of drop ceiling
- Note: The structural integrity of the building will not be modified.
- Wiring, carpet, insulation, temporary walls and drapery will not be replaced as part of the restoration efforts.

**2.3 West Building**

- No work will be performed in this building. It will only be used for the staging of equipment and materials to perform the work in the High Bay and South buildings.

**Period of Performance**

The period of performance for conducting these tasks is estimated at 18 days. The work will begin as soon as possible but will briefly cease during May 20 through May 31. The work will continue June 1. Work prior to May 20th will be performed in the evening.

**Concurrence**

EPA Region 8 and La Quinta have discussed this statement of work and mutually agree to its requirements and the schedule.

EPA Region 8 On Scene Coordinator

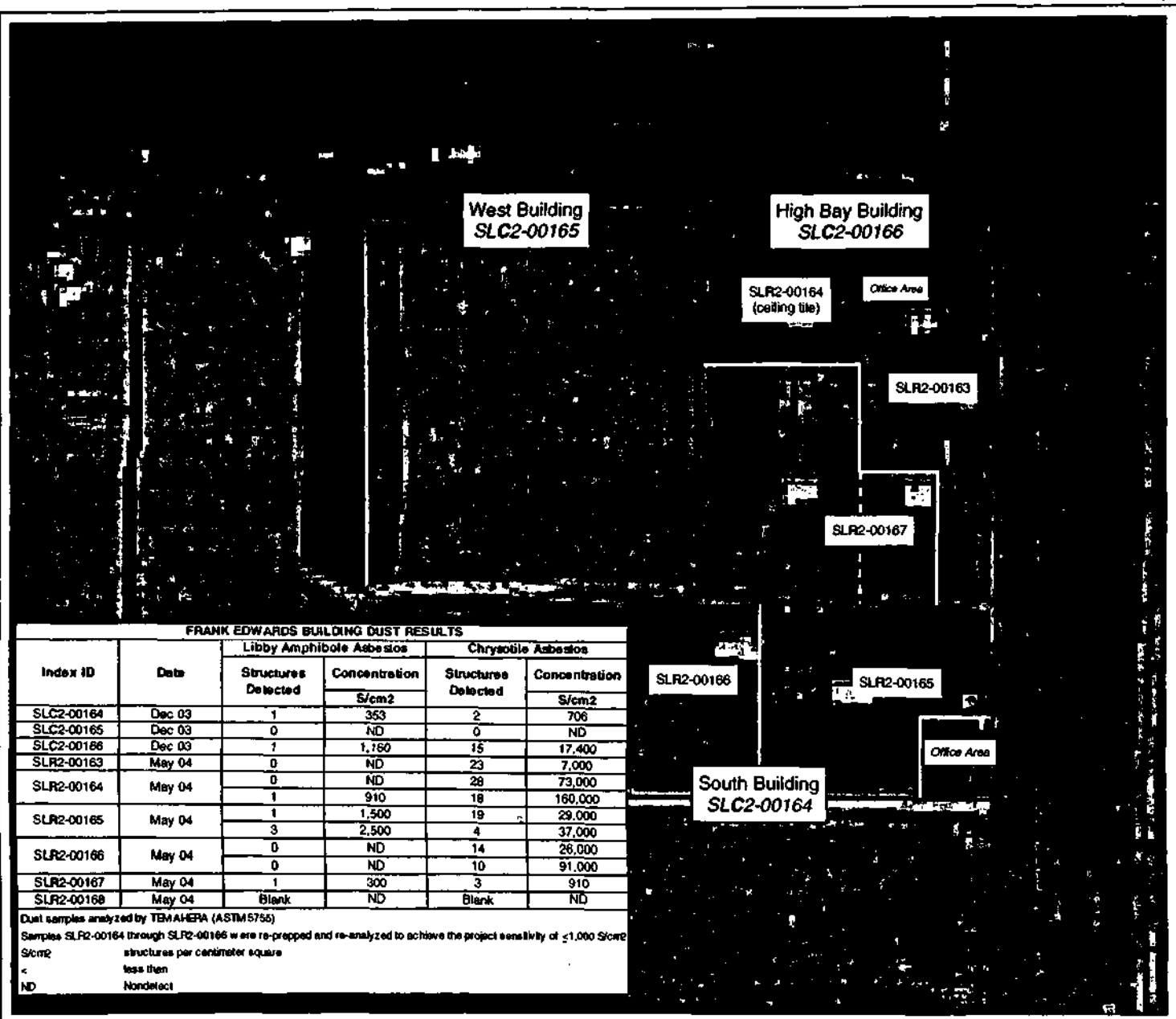
Floyd Nichols Date

La Quinta Representative

By: Scott Williams 5/13/04

Name Scott V. Williams Date

Affiliation Vice President




**FRANK EDWARDS BUILDING DUST RESULTS**

| Index ID | Date | Libby Amphibole Asbestos | | Chrysotile Asbestos | |
|---|---|---|---|---|---|
| | | Structures Detected | Concentration S/cm2 | Structures Detected | Concentration S/cm2 |
| SLC2-00164 | Dec 03 | 1 | 353 | 2 | 706 |
| SLC2-00165 | Dec 03 | 0 | ND | 0 | ND |
| SLC2-00166 | Dec 03 | 1 | 1,160 | 15 | 17,400 |
| SLR2-00163 | May 04 | 0 | ND | 23 | 7,000 |
| SLR2-00164 | May 04 | 0 | ND | 28 | 73,000 |
| | | 1 | 910 | 18 | 160,000 |
| SLR2-00165 | May 04 | 1 | 1,500 | 19 | 29,000 |
| | | 3 | 2,500 | 4 | 37,000 |
| SLR2-00166 | May 04 | 0 | ND | 14 | 26,000 |
| | | 0 | ND | 10 | 91,000 |
| SLR2-00167 | May 04 | 1 | 300 | 3 | 910 |
| SLR2-00168 | May 04 | Blank | ND | Blank | ND |

Dust samples analyzed by TEM AHERA (ASTM 5755)

Samples SLR2-00164 through SLR2-00166 were re-prepped and re-analyzed to achieve the project sensitivity of ≤1,000 S/cm2

S/cm2 structures per centimeter square

< less than

ND Nondetect

# Frank Edwards Building
# Dust Sample Location Map
# May 2004 Event

Vermiculite Intermountain Facility
Libby Sister Site
Salt Lake City, UT-SLC2

**Legend**

- Building Outline
- Site Boundary
- Approximate Location of Interior Building Walls

Note: Sample IDs noted below building labels were those collected during the December 2003 event

N
W E
S

Feet
0 25 50 75

CDM

Mapfilename: 040203_FrankEdwardsResults.mxd KS 2004-06-11

# Enclosure 4

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
999 18TH STREET - SUITE 500
DENVER, CO 80202-2466
http://www.epa.gov/region08

Ref: EPR-ER

# INITIAL POLLUTION REPORT
## Vermiculite Intermountain Site
## Salt Lake City, Utah

## I. HEADING

| | |
|---|---|
| Date: | January 6, 2003 |
| From: | Joyce Ackerman, On-Scene Coordinator |
| Agency: | EPA |
| Unit: | Region VIII - Emergency Response Program<br>999 18th Street, Suite 300<br>Denver Colorado 80202<br>(303) 312-6822 |
| To: | Kevin Mould, EPA Headquarters |
| POLREP No.: | Initial |
| Site: | Vermiculite Intermountain Site |

## II. BACKGROUND

| | |
|---|---|
| Site Number: | 08GA |
| Party Conducting the Action: | EPA |
| Response Authority: | CERCLA |
| CERCLIS No: | |
| NPL Status: | No |
| Action Memorandum Status: | NA |

## III. SITE INFORMATION

### A. Incident Category

Removal Evaluation

### B. Site Description

#### 1. Site description

This is one of many facilities that received vermiculite from a mine in Libby, Montana. The mine in Libby produced about 80% of the world's supply of vermiculite at one time and shipped vermiculite ore to various locations throughout the United States. The Libby vermiculite is co-mingled with amphibole asbestos of the tremolite-actinolite-richterite-winchite solution series and, as a result, there is asbestos contamination at many of the facilities which received vermiculite ore from the Libby mine.

The Vermiculite Intermountain facility received vermiculite ore in rail cars and "exfoliated" it, which means it was expanded in a furnace. The exfoliated vermiculite was sold as an insulation product, also known as "Zonolite." The original property boundaries apparently have changed and the former property is now divided among several entities, including Utah Power & Light, a commercial parking lot, and a storage unit business.

According to a business newspaper article found at the Historical Society, the facility was started up around 1940. The name was changed at some point to Intermountain Insulation. The business was moved in 1984 to 733 West 800 South. This new site is also undergoing a removal evaluation and is discussed in a separate polrep under the site name "Intermountain Insulation."

The property address was 333 West 100 South. No property has this address currently. During my initial site visit, I assumed that the exfoliation property was now occupied by the asphalt parking lot, which meant that the exfoliation property would have been capped. However, I was later contacted by a former employee from the exfoliation plant. He said the exfoliation building was located on an unpaved area next to an electrical substation, adjacent to the asphalt parking lot. He said the facility consisted of a building and railroad spur, both of which are now gone. The property is across the street from the Delta Center. This area of downtown Salt Lake City has undergone extensive renovation since the facility was in operation.

According to the former employee, the electrical substation was located next to the exfoliation plant when he worked there around the 1970s. The substation is owned by Utah Power & Light, a subsidiary of Pacificorp.

The surrounding neighborhood is primarily commercial.

2. Physical location

The Site is located at 333 West 100 South in Salt Lake City, Utah.

2. Removal Site Evaluation and Site Characteristics

The original boundaries of the site have not yet been determined by EPA. However, a former employee has stated that the majority of the exfoliation building was on land currently owned by Utah Power & Light. This property contains an electrical substation and some vacant, unpaved land. Some gravel fill has been placed on the substation property. This substation property is fenced with a chain-link fence and the gates are locked. A property which abuts the substation property is currently occupied by an asphalt commercial parking lot. The parking lot is a few feet higher in elevation than the substation property, which suggests that fill might have been brought in. Another property which abuts the substation is occupied by buildings for a storage unit business.

EPA and its contractors conducted a sampling event on the substation property in October 2002. Visible vermiculite could be seen on the ground surface in several locations. As geoprobe core samples were obtained, visible vermiculite/asbestos waste material, known as "stoner rock" to some, could be seen in the cores. Samples of the vermiculite on the ground surface yielded percent levels of amphibole asbestos in some locations. Samples of the subsurface material also

yielded percent levels of asbestos in some locations.

The area where the former railroad spur was located could not be sampled with the geoprobe due to high voltage power lines buried in the subsurface.

EPA alerted Utah Power & Light and Pacificorp representatives about the visible vermiculite on the ground surface and stoner rock in the subsurface. EPA learned that Pacificorp hired a local asbestos firm in December 2002 to vacuum up vermiculite on the ground surface with a high-efficiency vacuum to address immediate exposure concerns to employees. EPA has not learned what concentrations of asbestos may remain on the ground surface following the vacuuming procedure, if any.

Percent levels of asbestos still exist in the subsurface, and asbestos may be present on the ground surface of the substation property. Based on these results, I anticipate that a removal action will be necessary at this site, including excavation or capping or a combination of the two. The next step will be to discuss these options with the property owner. Additional sampling may be necessary on other properties to determine the extent of contamination. It may not be possible to sample on the storage unit property since a building has been built where the exfoliation facility was located.

3. Description of threat

Asbestos is of concern because chronic inhalation exposure to excessive levels of asbestos fibers suspended in air can result in lung diseases such as asbestosis, mesothelioma, and lung cancer. Subacute exposures as short as a few days have been shown to cause mesothelioma. Asbestos is a hazardous substance as defined by 40 CFR Section 302.4 of the NCP.

3. State and Local Role

EPA has kept the Utah Department of Environmental Quality apprised of the sampling events and results. Neither the State nor local agencies have the resources to conduct the needed site investigations or clean-ups independently. The UDEQ has assisted EPA in many facets of the removal evaluation, most notably in locating the exfoliation facilities since no addresses were available at the beginning of the investigation.

B. Future Plans

EPA will conduct additional sampling to determine the extent of contamination.

C. Key Issues

None at this time.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
999 18TH STREET - SUITE 500
DENVER, CO 80202-2466
http://www.epa.gov/region08

Ref: EPR-ER

# POLREP #2
## Vermiculite Intermountain Site
## Salt Lake City, Utah

## I. HEADING

| | |
|---|---|
| Date: | May 1, 2003 |
| From: | Floyd Nichols, On-Scene Coordinator |
| Agency: | EPA/8 |
| Unit: | Region VIII - Emergency Response Program<br>999 18th Street, Suite 300<br>Denver Colorado 80202<br>(303) 312-6983 |
| To: | Kevin Mould, EPA Headquarters |
| POLREP No.: | 2 |
| Site: | Vermiculite Intermountain Site<br>333 West 100 South (former)<br>Salt Lake City, Utah |

## II. BACKGROUND

| | |
|---|---|
| Site Number: | 08GA |
| Party Conducting the Action: | EPA |
| Response Authority: | CERCLA |
| CERCLIS No: | — |
| NPL Status: | No |
| Action Memorandum Status: | NA |

## III. SITE INFORMATION

### A. Incident Category

Removal Evaluation

### B. Site Description

#### 1. Site description

Vermiculite Intermountain ('VI'), located on the west edge of downtown Salt Lake City, UT, is one of many facilities that received vermiculite ore from a mine near Libby, Montana. The Libby mine, at one time, produced about 80% of the world's supply of vermiculite ore. From Libby, some of the ore was shipped to various locations throughout the United States for further processing and distribution. Vermiculite ore from the Libby mine is co-mingled with amphibole asbestos of the tremolite-actinolite-richterite-winchite solution series ('tremolite asbestos'), and varying amounts of tremolite asbestos remain at many of the facilities which

managed and/or processed ore from the Libby mine.

The VI facility received vermiculite ore in rail cars from 1940 until the early 1980s. In the mid 1980s, the facility was sold and the processing plant was relocated to another site several blocks away. At the VI facility, the ore was heated in a dry furnace until the imbedded layers of asbestos expanded ('exfoliated') (the process resembles that which happens to popcorn when it is heated). The exfoliated vermiculite (also known as "Zonolite) was then released to wholesale and retail markets for a variety of uses including home and building insulation and as a soil amendment. The original VI boundaries have changed over time - portions of the former site now consist of a Utah Power & Light (UPL) substation, a commercial parking lot, and small businesses.

The surrounding neighborhood is primarily commercial and recreational.

## 2. Removal Site Evaluation and Site Characteristics

The VI property and the surrounding area have undergone extensive urban redevelopment in the last 2-3 decades, and the original VI property boundaries are now indistinct. A former employee, however, stated that the majority of the VI exfoliation building was on the parcel now used by UPL (a PacifiCorp subsidiary) as an electrical substation. Some gravel fill has been placed in and around the substation hardware and across the adjacent parking/service areas. The substation is secured at all times by chain-link fencing and locked gates. Properties adjacent to the substation are currently used for a variety of municipal and/or commercial purposes.

During substation walkthrough inspections in 2002, what appeared to be vermiculite could be seen on the ground surface in several locations. EPA subsequently sampled portions of the substation property in October 2002. As geoprobe core samples were obtained, what appeared to be visible vermiculite/asbestos waste material (a.k.a., "stoner rock") could be seen in the cores. Analysis of surface and subsurface soils indicated percent-levels of tremolite asbestos in some surface locations and at some subsurface horizons.

Following EPA notification of the analytical findings, UPL, through a local asbestos firm in December 2002, removed loose vermiculite from the scarified ground surface using a high-efficiency vacuum in order to address immediate exposure concerns for their employees. Efficacy samples following that mitigation effort have not been collected.

Percent levels of tremolite asbestos remain in the subsurface at the UPL substation, and may also be present on the ground surface within and around the substation. Additional sampling will be necessary at and adjacent to the substation to determine the extent of contamination.

## 3. Description of threat

Asbestos is a hazardous substance as defined by the NCP (40 CFR Section 302.4). Tremolite asbestos is of concern because chronic inhalation of excessive concentrations of the fibers can possibly result in lung diseases such as asbestosis, mesothelioma, and cancer. Subacute exposures as short as a few days may cause mesothelioma.

4. State and Local Role

EPA has consulted with the Utah Department of Environmental Quality (UDEQ) concerning the sampling events and results. Neither UDEQ nor local agencies have the resources to conduct the needed site investigations or clean-ups independently.

## B. Future Plans

EPA will conduct additional sampling in order to determine the extent of contamination. Following such determination, EPA will review the findings, options, and plans with appropriate UDEQ, UPL, and Salt Lake City representatives, and other interested parties.

## C. Key Issues

None identified at this time.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
999 18TH STREET - SUITE 500
DENVER, CO 80202-2466
http://www.epa.gov/region08

**Ref: EPR-ER**

**POLREP #3**
**Vermiculite Intermountain Site**
**Salt Lake City, Utah**

I. HEADING

| | |
|---|---|
| **Date:** | **April 27, 2004** |
| From: | Floyd Nichols, On Scene Coordinator<br>Craig Myers, On Scene Coordinator |
| Agency: | EPA/8 |
| Unit: | Region VIII - Emergency Response Program<br>999 18th Street, Suite 300<br>Denver Colorado 80202<br>(303) 312-6983 |
| To: | Kevin Mould, EPA Headquarters |
| **POLREP No.:** | **3** |
| Site: | Vermiculite Intermountain Site<br>333 West 100 South (former)<br>Salt Lake City, Utah |

II. BACKGROUND

| | |
|---|---|
| Site Number: | 08GA |
| Party Conducting the Action: | EPA |
| Response Authority: | CERCLA |
| CERCLIS No: | — |
| NPL Status: | No |
| Action Memorandum Status: | **Approved April 7, 2004** |
| **Start Date:** | **April 14, 2004** |
| **Complete Date:** | **TBD** |

III. SITE INFORMATION

A. Incident Category

Time Critical Removal Action

B. Site Description

1. Site description

Vermiculite Intermountain ('VI'), located on the west edge of downtown Salt Lake City, UT, is one of many facilities that received vermiculite ore from a mine near Libby, Montana. The Libby mine, at one time, produced about 80% of the world's supply of vermiculite ore. From Libby, some of the ore was shipped to various locations throughout the United States for further processing and distribution. Vermiculite ore from the Libby mine is co-mingled with amphibole asbestos of the tremolite-actinolite-richterite-winchite solution series ('tremolite asbestos'), and varying amounts of tremolite asbestos remain at many of the facilities which managed and/or processed ore from the Libby mine.

The VI facility received vermiculite ore in rail cars from 1940 until the early 1980s. In the mid 1980s, the facility was sold and the processing plant was relocated to another site several blocks away. At the VI facility, the ore was heated in a dry furnace until the imbedded layers of asbestos expanded ('exfoliated') (the process resembles that which happens to popcorn when it is heated). The exfoliated vermiculite (also known as "Zonolite) was then released to wholesale and retail markets for a variety of uses including home and building insulation and as a soil amendment. The original VI boundaries have changed over time - portions of the former site now consist of a Utah Power & Light (UPL) substation, a commercial parking lot, and small businesses.

The surrounding neighborhood is primarily commercial and recreational.

2. Removal Site Evaluation and Site Characteristics

The VI property and the surrounding area have undergone extensive urban redevelopment in the last 2-3 decades, and the original VI property boundaries are now indistinct. A former employee, however, stated that the majority of the VI exfoliation building was on the parcel now used by UPL (a PacifiCorp subsidiary) as an electrical substation. Some gravel fill has been placed in and around the substation hardware and across the adjacent parking/service areas. The substation is secured at all times by chain-link fencing and locked gates. Properties adjacent to the substation are currently used for a variety of municipal and/or commercial purposes.

During substation walkthrough inspections in 2002, what appeared to be vermiculite could be seen on the ground surface in several locations. EPA subsequently sampled portions of the substation property in October 2002. As geoprobe core samples were obtained, what appeared to be visible vermiculite/asbestos waste material (a.k.a., "stoner rock") could be seen in the cores. Analysis of surface and subsurface soils indicated percent-levels of tremolite asbestos in some surface locations and at some subsurface horizons.

Following EPA notification of the analytical findings, UPL, through a local asbestos firm in December 2002, removed loose vermiculite from the scarified ground surface using a high-efficiency vacuum in order to address immediate exposure concerns for their employees. Efficacy samples following that mitigation effort have not been collected.

Percent levels of tremolite asbestos remain in the subsurface at the UPL substation, and trace to percent levels are also present on the ground surface within the substation.

**Additional Libby Amphibole (LA)-focussed samples were collected at various locations within the (downtown) Salt Lake City one-square-block area (bordered by 100 South, 400 West, 200 South, and 300 West Streets) surrounding the old "VI" location.**

**<u>Utah Paper Box Company</u>**
**Ambient air samples, personal air samples, and dust samples were taken throughout the facility, and no LA contamination was found.**

**<u>Artistic Printing</u>**
**Ambient air samples, personal air samples, and dust samples were collected throughout the facility, with LA being detected in all dust and one ambient air sample. Following detailed discussions about activity timing and sequencing, the facility owner was able to identify an 'economic window of opportunity' for the TCRA. Accordingly, EPA initiated the Removal on April 14. Currently, Artistic Printing continues in daily operation, 5-days per week. Cleanup crews enter the facility as it is being vacated by the business employees at the end of the workday. Removal**

**actions continue overnight (and on weekends) until the employees return at the start of the next workday. Current schedules call for the business to cease operations entirely on May 19. Subsequently, the TCRA will continue 24-hours per day until clearance sampling shows ND for LA.**

**Frank Edwards Building (owned by La Quinta Corporation)**
**Dust samples collected inside the vacant building showed LA contamination in two of three rooms. Additional interior samples are being collected so as to further delineate the interior spaces to be included in the pending EPA-lead TCRA. Mobilization for cleanup inside the building is expected in mid-May.**

**AMPCO Parking Lot (owned by La Quinta Corporation)**
**Core samples show trace amounts of LA at a depth of 32" to 38" below the surface of the parking lot. Additional sub-surface samples are being collected across the parking lot in order to further define the extent of contamination. Scheduling of the TCRA for cleanup of the parking lot is pending.**

3. Description of threat

Asbestos is a hazardous substance as defined by the NCP (40 CFR Section 302.4). Tremolite asbestos is of concern because chronic inhalation of excessive concentrations of the fibers can possibly result in lung diseases such as asbestosis, mesothelioma, and cancer. Subacute exposures as short as a few days may cause mesothelioma.

4. State and Local Role

EPA has consulted with the Utah Department of Environmental Quality (UDEQ) concerning the sampling events and results. Neither UDEQ nor local agencies have the resources to conduct the needed site investigations or clean-ups independently.

B. Current Actions

**EPA is continuing a cleanup of Artistic Printing, with a projected completion date of May 31, 2004. Actions to date include construction of interior isolation/containment areas, HEPA-Vacuuming and wet-wiping feed-stock, finished products, and related miscellaneous items, and cleaning 'fringe' and 'isolated' areas within the building. Relocation and cleaning of business office space(s) will be initiated the week of May 1.**

C. Future Plans

**EPA will continue collecting dust samples inside the Frank Edwards Building so as to determine the extent of contamination. Tentative mobilization date for EPA-led TCRA inside the Frank Edwards Building is May 2004.**

**EPA and PacifiCorp (Utah Power and Light parent company) continue negotiating an Administrative Order on Consent (AOC) for the cleanup of the UP&L substation parcel. Tentative mobilization date for PacifiCorp's action is June 2004.**

**EPA will continue collecting and evaluating sub-surface samples from the Ampco Parking Lot.**

D. Key Issues

None identified at this time.

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
999 18th Street – Suite 300
Denver, Colorado 80202
http://www.epa.gov/region8

Ref: EPR-ER

**POLREP #4**
**Vermiculite Intermountain Site**
Salt Lake City, Utah

## I. HEADING

| | |
|---|---|
| **Date:** | **May 14, 2004** |
| From: | Floyd Nichols, On Scene Coordinator<br>Craig Myers, On Scene Coordinator |
| Agency: | EPA/8 |
| Unit: | Region VIII - Emergency Response Program<br>999 18th Street, Suite 300<br>Denver Colorado 80202<br>(303) 312-6983 |
| **POLREP No:** | **POLREP # 4** |
| **Site:** | **Vermiculite Intermountain Site**<br>**333 West 100 South (former)**<br>**Salt Lake City, Utah** |

## II. BACKGROUND

| | |
|---|---|
| Site Number: | 08-GA |
| Party Conducting the Action: | EPA |
| Response Authority: | CERCLA |
| NPL Status: | No |
| Action Memorandum Status: | Approved April 7, 2004 |
| **Date Action Started:** | **April 14, 2004** |
| **Completion Date:** | **TBD** |

## III. SITE INFORMATION

### A. Incident Category

Time Critical Removal Action

### B. Site Description

#### 1. *Site description*

Vermiculite Intermountain ('VI'), located on the west edge of downtown Salt Lake City,

UT, is one of many facilities that received vermiculite ore from a mine near Libby, Montana. The Libby mine, at one time, produced about 80% of the world's supply of vermiculite ore. From Libby, some of the ore was shipped to various locations throughout the United States for further processing and distribution. Vermiculite ore from the Libby mine is co-mingled with amphibole asbestos of the tremolite-actinolite-richterite-winchite solution series ('tremolite asbestos'), and varying amounts of tremolite asbestos remain at many of the facilities which managed and/or processed ore from the Libby mine.

The VI facility received vermiculite ore in rail cars from 1940 until the early 1980s. In the mid 1980s, the facility was sold and the processing plant was relocated to another site several blocks away. At the VI facility, the ore was heated in a dry furnace until the imbedded layers of asbestos expanded ('exfoliated') (the process resembles that which happens to popcorn when it is heated). The exfoliated vermiculite (also known as "Zonolite) was then released to wholesale and retail markets for a variety of uses including home and building insulation and as a soil amendment. The original VI boundaries have changed over time - portions of the former site now consist of a Utah Power & Light (UPL) substation, a commercial parking lot, and small businesses. The surrounding neighborhood is primarily commercial and recreational.

2. Site evaluation and characteristics

The VI property and the surrounding area have undergone extensive urban redevelopment in the last 2-3 decades, and the original VI property boundaries are now indistinct. A former employee, however, stated that the majority of the VI exfoliation building was on the parcel now used by UPL (a PacifiCorp subsidiary) as an electrical substation. Some gravel fill has been placed in and around the substation hardware and across the adjacent parking/service areas. The substation is secured at all times by chain-link fencing and locked gates. Properties adjacent to the substation are currently used for a variety of municipal and/or commercial purposes.

During substation walkthrough inspections in 2002, what appeared to be vermiculite could be seen on the ground surface in several locations. EPA subsequently sampled portions of the substation property in October 2002. As geoprobe core samples were obtained, what appeared to be visible vermiculite/asbestos waste material (a.k.a., "stoner rock") could be seen in the cores. Analysis of surface and subsurface soils indicated percent-levels of tremolite asbestos in some surface locations and at some subsurface horizons.

Following EPA notification of the analytical findings, UPL, through a local asbestos firm in December 2002, removed loose vermiculite from the scarified ground surface using a high-efficiency vacuum in order to address immediate exposure concerns for their employees. Efficacy samples following that mitigation effort have not been collected.

Percent levels of tremolite asbestos remain in the subsurface at the UPL substation, and trace to percent levels are also present on the ground surface within the substation.

**Additional Libby Ampohibole (LA)-focused samples were collected at various locations within the (downtown) Salt Lake City one-square-block area (bordered by 100 South, 400 West, 200 South, and 300 West Streets) surrounding the old "VI" location.**

**Utah Paper Box Company**

**Ambient air samples, personal air samples, and dust samples were taken throughout the facility, and no LA contamination was found.**

Artistic Printing

**Ambient air samples, personal air samples, and dust samples were collected throughout the facility, with LA being detected in all dust and one ambient air sample. Following detailed discussions about activity timing and sequencing, the facility owner was able to identify an "economic window of opportunity" for the TCRA. Accordingly, EPA initiated the Removal on April 14. Currently, Artistic Printing continues in daily operation, 5-days per week. Cleanup crews enter the facility as the business employees are vacating it at the end of the workday. Removal actions continue overnight (and on weekends) until the employees return at the start of the next workday. Current schedules call for the business to cease operations entirely on May 19. Subsequently, the TCRA will continue 24-hours per day until clearance sampling shows ND for LA.**

Frank Edwards Building (owned by La Quinta Corporation)

**Dust samples collected inside the vacant building showed LA contamination in two of three rooms. Additional interior samples are being collected so as to further delineate the interior spaces to be included in the pending EPA-lead TCRA. Mobilization for cleanup inside the building is expected in late-May.**

AMPCO Parking Lot (owned by La Quinta Corporation)

**Core samples show trace amounts of LA at a depth of 32" to 38" below the surface of the parking lot. Additional sub-surface samples are being collected across the parking lot in order to further define the extent of contamination. Scheduling of the TCRA for cleanup of the parking lot is pending.**

3. Description of threat

Asbestos is a hazardous substance as defined by the NCP (40 CFR Section 302.4). Tremolite asbestos is of concern because chronic inhalation of excessive concentrations of the fibers can possibly result in lung diseases such as asbestosis, mesothelioma, and cancer. Sub acute exposures as short as a few days may cause mesothelioma.

4. State and Local Role

EPA has consulted with the Utah Department of Environmental Quality (UDEQ) concerning the sampling events and results. Neither UDEQ nor local agencies have the resources to conduct the needed site investigations or clean-ups independently.

B. Current Actions

**EPA is continuing a cleanup of Artistic Printing, with a projected completion date of May 31, 2004. Actions to date include construction of interior isolation/containment areas, HEPA-Vacuuming and wet-wiping feed-stock, finished products, and related miscellaneous**

**items, and cleaning 'fringe' and 'isolated' areas within the building. To date the following areas have been certified clean: ink room, south containment area, break room, and the east bay dock. The east bay containment area has been visually inspected and awaiting analysis of air samples. Ambient and personal air samples continue to be taken.**

**Interior isolation/containment is being erected in the Frank Edwards Building. Cleaning is not planned to begin until sometime after May 19th.**

C. Future Plans

**Artistic printing will shut down printing operations on May 19th and clean-up operations will commence as a 24hr operation.**

**EPA will continue collecting dust samples inside the Frank Edwards Building so as to determine the extent of contamination. Tentative mobilization date for EPA-led TCRA inside the Frank Edwards Building is late May 2004.**

**EPA will continue collecting and evaluating sub-surface samples from the Ampco Parking Lot.**

D. Key Issues

None identified at this time

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**REGION 8**
**999 18th Street – Suite 300**
**Denver, Colorado 80202**
**http://www.epa.gov/region8**

Ref: EPR-ER

POLREP #6
Vermiculite Intermountain Site
Salt Lake City, Utah

## I. HEADING

| | |
|---|---|
| Date: | June 4, 2004 |
| From: | Floyd Nichols, On Scene Coordinator<br>Craig Myers, On Scene Coordinator |
| Agency: | EPA/8 |
| Unit: | Region VIII - Emergency Response Program<br>999 18th Street, Suite 300<br>Denver Colorado 80202<br>(303) 312-6983 |
| POLREP No: | POLREP #6 |
| Site: | Vermiculite Intermountain Site<br>333 West 100 South (former)<br>Salt Lake City, Utah |

## II. BACKGROUND

| | |
|---|---|
| Site Number: | 08-GA |
| Party Conducting the Action: | EPA |
| Response Authority: | CERCLA |
| NPL Status: | No |
| Action Memorandum Status: | Approved April 7, 2004 |
| Date Action Started: | April 14, 2004 |
| Completion Date: | TBD |

## III. SITE INFORMATION

### A. Incident Category

Time Critical Removal Action

### B. Site Description

#### 1. Site description

Vermiculite Intermountain ('VI'), located on the west edge of downtown Salt Lake City,

UT, is one of many facilities that received vermiculite ore from a mine near Libby, Montana. The Libby mine, at one time, produced about 80% of the world's supply of vermiculite ore. From Libby, some of the ore was shipped to various locations throughout the United States for further processing and distribution. Vermiculite ore from the Libby mine is co-mingled with amphibole asbestos of the tremolite-actinolite-richterite-winchite solution series ('tremolite asbestos'), and varying amounts of tremolite asbestos remain at many of the facilities which managed and/or processed ore from the Libby mine.

The VI facility received vermiculite ore in rail cars from 1940 until the early 1980s. In the mid 1980s, the facility was sold and the processing plant was relocated to another site several blocks away. At the VI facility, the ore was heated in a dry furnace until the imbedded layers of asbestos expanded ('exfoliated') (the process resembles that which happens to popcorn when it is heated). The exfoliated vermiculite (also known as "Zonolite) was then released to wholesale and retail markets for a variety of uses including home and building insulation and as a soil amendment. The original VI boundaries have changed over time - portions of the former site now consist of a Utah Power & Light (UPL) substation, a commercial parking lot, and small businesses. The surrounding neighborhood is primarily commercial and recreational.

## 2. Site evaluation and characteristics

The VI property and the surrounding area have undergone extensive urban redevelopment in the last 2-3 decades, and the original VI property boundaries are now indistinct. A former employee, however, stated that the majority of the VI exfoliation building was on the parcel now used by UPL (a PacifiCorp subsidiary) as an electrical substation. Some gravel fill has been placed in and around the substation hardware and across the adjacent parking/service areas. The substation is secured at all times by chain-link fencing and locked gates. Properties adjacent to the substation are currently used for a variety of municipal and/or commercial purposes.

During substation walkthrough inspections in 2002, what appeared to be vermiculite could be seen on the ground surface in several locations. EPA subsequently sampled portions of the substation property in October 2002. As geoprobe core samples were obtained, what appeared to be visible vermiculite/asbestos waste material (a.k.a., "stoner rock") could be seen in the cores. Analysis of surface and subsurface soils indicated percent-levels of tremolite asbestos in some surface locations and at some subsurface horizons.

Following EPA notification of the analytical findings, UPL, through a local asbestos firm in December 2002, removed loose vermiculite from the scarified ground surface using a high-efficiency vacuum in order to address immediate exposure concerns for their employees. Efficacy samples following that mitigation effort have not been collected.

Percent levels of tremolite asbestos remain in the subsurface at the UPL substation, and trace to percent levels are also present on the ground surface within the substation.

Additional Libby Amphibole (LA)-focused samples were collected at various locations within the (downtown) Salt Lake City one-square-block area (bordered by 100 South, 400 West, 200 South, and 300 West Streets) surrounding the old "VI" location.

Ambient air samples, personal air samples, and dust samples were taken throughout the facility, and no LA contamination was found.

Artistic Printing

Ambient air samples, personal air samples, and dust samples were collected throughout the facility, with LA being detected in all dust and one ambient air sample. Following detailed discussions about activity timing and sequencing, the facility owner was able to identify an "economic window of opportunity" for the TCRA. Accordingly, EPA initiated the Removal on April 14, 2004.

Frank Edwards Building (owned by La Quinta Corporation)

Dust samples collected inside the vacant building showed LA contamination in two of three rooms. Mobilization for cleanup inside the building is expected in late-May.

AMPCO Parking Lot (owned by La Quinta Corporation)

Core samples show trace amounts of LA at a depth of 32" to 38" below the surface of the parking lot. Additional sub-surface samples are being collected across the parking lot in order to further define the extent of contamination. Scheduling of the TCRA for cleanup of the parking lot is pending.

3. Description of threat

Asbestos is a hazardous substance as defined by the NCP (40 CFR Section 302.4). Tremolite asbestos is of concern because chronic inhalation of excessive concentrations of the fibers can possibly result in lung diseases such as asbestosis, mesothelioma, and cancer. Sub acute exposures as short as a few days may cause mesothelioma.

4. State and Local Role

EPA has consulted with the Utah Department of Environmental Quality (UDEQ) concerning the sampling events and results. Neither UDEQ nor local agencies have the resources to conduct the needed site investigations or clean-ups independently.

C. Current Actions

**Libby Amphibole (LA) mitigation inside Artistic Printing is complete.**

**All miscellaneous equipment and machines were cleaned and checked, with microvac samples collected at various, random locations. When analytical results showed non-detect for LA, the equipment was covered, with the shrouds sealed to the floor with duct tape. Structural portions of the 'press' room, the 'bindery' room, and the office area were then cleaned, cleared, and encapsulated. Initial clearance sampling in the press room showed 1 LA structure on the sample cartridge. Accordingly, the press room was re-cleaned, re-encapsulated, and re-cleared, with the new analytical results showing non-detect for LA. Following final clearance, crews commenced transferring stock, miscellaneous supplies, and other Artistic Printing items from storage trailers back into the cleaned building. Artistic Printing resumed limited production on June 2.**

Isolation and containment barriers are being installed in the Frank Edwards Building (FEB).

D. Future Plans

Artistic Printing: Continue returning miscellaneous stock, equipment, and supplies from the temporary storage trailers to the building.

FEB: Complete installation of containments and negative air units, smoke test containments and commence building cleanup.

3rd Street (Electrical) Substation: Continue negotiations with PRP on an Administrative Order on Consent (AOC) for LA cleanup of the substation parcel.

Ampco Parking Lot: Continue negotiations with the PRP concerning institutional controls for the site.

E. Key Issues

None identified at this time

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**REGION 8**
**999 18th Street – Suite 300**
**Denver, Colorado 80202**
**http://www.epa.gov/region8**

Ref: EPR-ER

**POLREP #7**
Vermiculite Intermountain Site
Salt Lake City, Utah

## I. HEADING

| | |
|---|---|
| **Date:** | **July 16, 2004** |
| From: | Floyd Nichols, On Scene Coordinator |
| | Craig Myers, On Scene Coordinator |
| Agency: | EPA/8 |
| Unit: | Region VIII - Emergency Response Program |
| | 999 18th Street, Suite 300 |
| | Denver Colorado 80202 |
| | (303) 312-6983 |
| **POLREP No:** | **POLREP #7** |
| Site: | Vermiculite Intermountain Site |
| | 333 West 100 South (former) |
| | Salt Lake City, Utah |

## II. BACKGROUND

| | |
|---|---|
| Site Number: | 08-GA |
| Party Conducting the Action: | EPA |
| Response Authority: | CERCLA |
| NPL Status: | No |
| Action Memorandum Status: | Approved April 7, 2004 |
| Date Action Started: | April 14, 2004 |
| Completion Date: | TBD |

## III. SITE INFORMATION

### A. Incident Category

Time Critical Removal Action

### B. Site Description

#### 1. Site description

Vermiculite Intermountain ('VI'), located on the west edge of downtown Salt Lake City, UT, is one of many facilities that received vermiculite ore from a mine near Libby, Montana. The Libby mine, at one time, produced about 80% of the world's supply of vermiculite ore. From Libby, some of the ore was shipped to various locations throughout

the United States for further processing and distribution. Vermiculite ore from the Libby mine is co-mingled with amphibole asbestos of the tremolite-actinolite-richterite-winchite solution series ('tremolite asbestos'), and varying amounts of tremolite asbestos remain at many of the facilities which managed and/or processed ore from the Libby mine.

The VI facility received vermiculite ore in rail cars from 1940 until the early 1980s. In the mid 1980s, the facility was sold and the processing plant was relocated to another site several blocks away. At the VI facility, the ore was heated in a dry furnace until the imbedded layers of asbestos expanded ('exfoliated') (the process resembles that which happens to popcorn when it is heated). The exfoliated vermiculite (also known as "Zonolite) was then released to wholesale and retail markets for a variety of uses including home and building insulation and as a soil amendment. The original VI boundaries have changed over time - portions of the former site now consist of a Utah Power & Light (UPL) substation, a commercial parking lot, and small businesses. The surrounding neighborhood is primarily commercial and recreational.

2. Site evaluation and characteristics

The VI property and the surrounding area have undergone extensive urban redevelopment in the last 2-3 decades, and the original VI property boundaries are now indistinct. A former employee, however, stated that the majority of the VI exfoliation building was on the parcel now used by UPL (a PacifiCorp subsidiary) as an electrical substation. Some gravel fill has been placed in and around the substation hardware and across the adjacent parking/service areas. The substation is secured at all times by chain-link fencing and locked gates. Properties adjacent to the substation are currently used for a variety of municipal and/or commercial purposes.

During substation walkthrough inspections in 2002, what appeared to be vermiculite could be seen on the ground surface in several locations. EPA subsequently sampled portions of the substation property in October 2002. As geoprobe core samples were obtained, what appeared to be visible vermiculite/asbestos waste material (a.k.a., "stoner rock") could be seen in the cores. Analysis of surface and subsurface soils indicated percent-levels of tremolite asbestos in some surface locations and at some subsurface horizons.

Following EPA notification of the analytical findings, UPL, through a local asbestos firm in December 2002, removed loose vermiculite from the scarified ground surface using a high-efficiency vacuum in order to address immediate exposure concerns for their employees. Efficacy samples following that mitigation effort have not been collected.

Percent levels of tremolite asbestos remain in the subsurface at the UPL substation, and trace to percent levels are also present on the ground surface within the substation.

Additional Libby Amphibole (LA)-focused samples were collected at various locations within the (downtown) Salt Lake City one-square-block area (bordered by 100 South, 400 West, 200 South, and 300 West Streets) surrounding the old "VI" location.

Utah Paper Box Company

Ambient air samples, personal air samples, and dust samples were taken throughout the facility, and no LA contamination was found.

Artistic Printing

Ambient air samples, personal air samples, and dust samples were collected throughout the facility, with LA being detected in all dust and one ambient air sample. Following detailed discussions about activity timing and sequencing, the facility owner was able to identify an "economic window of opportunity" for the TCRA. Accordingly, EPA initiated the Removal on April 14, 2004.

Frank Edwards Building (owned by La Quinta Corporation)

Dust samples collected inside the vacant building showed LA contamination in two of three rooms. Mobilization for cleanup inside the building is expected in late-May.

AMPCO Parking Lot (owned by La Quinta Corporation)

Core samples show trace amounts of LA at a depth of 32" to 38" below the surface of the parking lot. Additional sub-surface samples are being collected across the parking lot in order to further define the extent of contamination. Scheduling of the TCRA for cleanup of the parking lot is pending.

3. Description of threat

Asbestos is a hazardous substance as defined by the NCP (40 CFR Section 302.4). Tremolite asbestos is of concern because chronic inhalation of excessive concentrations of the fibers can possibly result in lung diseases such as asbestosis, mesothelioma, and cancer. Sub acute exposures as short as a few days may cause mesothelioma.

4. State and Local Role

EPA has consulted with the Utah Department of Environmental Quality (UDEQ) concerning the sampling events and results. Neither UDEQ nor local agencies have the resources to conduct the needed site investigations or clean-ups independently.

C. Current Actions

Libby Amphibole (LA) mitigation inside Artistic Printing is complete.

All miscellaneous equipment and machines were cleaned and checked, with microvac samples collected at various, random locations. When analytical results showed non- detect for LA, the equipment was covered, with the shrouds sealed to the floor with duct tape. Structural portions of the 'press' room, the 'bindery' room, and the office area were then cleaned, cleared, and encapsulated. Initial clearance sampling in the press room showed 1 LA structure on the sample cartridge. Accordingly, the press room was re-cleaned, re-encapsulated, and re-cleared, with the new analytical results showing non-detect for LA. Following final clearance, crews commenced transferring stock, miscellaneous supplies, and other Artistic Printing items from storage trailers back into the cleaned building. Artistic Printing resumed limited production on June 2.

**Libby Amphibole (LA) mitigation inside the Frank Edwards Building (FEB) is complete.**

**Containment/isolation barriers were erected around interior office spaces. Old carpeting, drop ceiling panels, and non-essential wiring were stripped from the isolated spaces and removed for off-site disposal. Old ceiling insulation was removed from a portion of the FEB to off-site disposal. The building interior was cleaned by combinations of low-pressure water flushing and rinse, wet and dry wiping, and vacuuming. Cleaning was followed by liberal use of encapsulant. After a single LA structure was detected in clearance samples collected in one of the smaller isolation areas, the area was re-vacuumed and encapsulant re-applied. A subsequent clearance sample showed ND for LA. Response crews then installed replacement drop ceiling panels in the interior offices and replacement ceiling insulation bats in a portion of the FEB, and restored the HVAC system to a operational state. A final building walk-through with a representative of the building's owner was held on July 13, 2004, and the ERRS completed demob on July 16, 2004.**

**3rd Street (Electrical) Substation:**

**PRP conducted a pre-bid conference re: cleanup of the 2-story switch house on July 14. Initiation of PRP cleanup of the substation parcel is pending.**

D. Future Plans

**Ampco Parking Lot: State will continue negotiations with the PRP concerning institutional controls for the site.**

E. Key Issues

None identified at this time

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**REGION 8**
**999 18th Street – Suite 300**
**Denver, Colorado 80202**
**http://www.epa.gov/region8**

Ref: EPR-ER

POLREP #8
Vermiculite Intermountain Site
Salt Lake City, Utah

## I. HEADING

| | |
|---|---|
| **Date:** | **July 16, 2004** |
| From: | Floyd Nichols, On Scene Coordinator |
| | Craig Myers, On Scene Coordinator |
| Agency: | EPA/8 |
| Unit: | Region VIII - Emergency Response Program |
| | 999 18th Street, Suite 300 |
| | Denver Colorado 80202 |
| | (303) 312-6983 |
| **POLREP No:** | **POLREP #8** |
| Site: | Vermiculite Intermountain Site |
| | 333 West 100 South (former) |
| | Salt Lake City, Utah |

## II. BACKGROUND

| | |
|---|---|
| Site Number: | 08-GA |
| Party Conducting the Action: | EPA |
| Response Authority: | CERCLA |
| NPL Status: | No |
| Action Memorandum Status: | Approved April 7, 2004 |
| Date Action Started: | April 14, 2004 |
| Completion Date: | TBD |

## III. SITE INFORMATION

### A. Incident Category

Time Critical Removal Action

### B. Site Description

#### 1. Site description

Vermiculite Intermountain ('VI'), located on the west edge of downtown Salt Lake City, UT, is one of many facilities that received vermiculite ore from a mine near Libby, Montana. The Libby mine, at one time, produced about 80% of the world's supply of vermiculite ore. From Libby, some of the ore was shipped to various locations throughout

the United States for further processing and distribution. Vermiculite ore from the Libby mine is co-mingled with amphibole asbestos of the tremolite-actinolite-richterite-winchite solution series ('tremolite asbestos'), and varying amounts of tremolite asbestos remain at many of the facilities which managed and/or processed ore from the Libby mine.

The VI facility received vermiculite ore in rail cars from 1940 until the early 1980s. In the mid 1980s, the facility was sold and the processing plant was relocated to another site several blocks away. At the VI facility, the ore was heated in a dry furnace until the imbedded layers of asbestos expanded ('exfoliated') (the process resembles that which happens to popcorn when it is heated). The exfoliated vermiculite (also known as "Zonolite) was then released to wholesale and retail markets for a variety of uses including home and building insulation and as a soil amendment. The original VI boundaries have changed over time - portions of the former site now consist of a Utah Power & Light (UPL) substation, a commercial parking lot, and small businesses. The surrounding neighborhood is primarily commercial and recreational.

2. Site evaluation and characteristics

The VI property and the surrounding area have undergone extensive urban redevelopment in the last 2-3 decades, and the original VI property boundaries are now indistinct. A former employee, however, stated that the majority of the VI exfoliation building was on the parcel now used by UPL (a PacifiCorp subsidiary) as an electrical substation. Some gravel fill has been placed in and around the substation hardware and across the adjacent parking/service areas. The substation is secured at all times by chain-link fencing and locked gates. Properties adjacent to the substation are currently used for a variety of municipal and/or commercial purposes.

During substation walkthrough inspections in 2002, what appeared to be vermiculite could be seen on the ground surface in several locations. EPA subsequently sampled portions of the substation property in October 2002. As geoprobe core samples were obtained, what appeared to be visible vermiculite/asbestos waste material (a.k.a., "stoner rock") could be seen in the cores. Analysis of surface and subsurface soils indicated percent-levels of tremolite asbestos in some surface locations and at some subsurface horizons.

Following EPA notification of the analytical findings, UPL, through a local asbestos firm in December 2002, removed loose vermiculite from the scarified ground surface using a high-efficiency vacuum in order to address immediate exposure concerns for their employees. Efficacy samples following that mitigation effort have not been collected.

Percent levels of tremolite asbestos remain in the subsurface at the UPL substation, and trace to percent levels are also present on the ground surface within the substation.

Additional Libby Amphibole (LA)-focused samples were collected at various locations within the (downtown) Salt Lake City one-square-block area (bordered by 100 South, 400 West, 200 South, and 300 West Streets) surrounding the old "VI" location.

Utah Paper Box Company

Ambient air samples, personal air samples, and dust samples were taken throughout the facility, and no LA contamination was found.

Artistic Printing

Ambient air samples, personal air samples, and dust samples were collected throughout the facility, with LA being detected in all dust and one ambient air sample. Following detailed discussions about activity timing and sequencing, the facility owner was able to identify an "economic window of opportunity" for the TCRA. Accordingly, EPA initiated the Removal on April 14, 2004.

Frank Edwards Building (owned by La Quinta Corporation)

Dust samples collected inside the vacant building showed LA contamination in two of three rooms. Mobilization for cleanup inside the building is expected in late-May.

AMPCO Parking Lot (owned by La Quinta Corporation)

Core samples show trace amounts of LA at a depth of 32" to 38" below the surface of the parking lot. Additional sub-surface samples are being collected across the parking lot in order to further define the extent of contamination. Scheduling of the TCRA for cleanup of the parking lot is pending.

3. Description of threat

Asbestos is a hazardous substance as defined by the NCP (40 CFR Section 302.4). Tremolite asbestos is of concern because chronic inhalation of excessive concentrations of the fibers can possibly result in lung diseases such as asbestosis, mesothelioma, and cancer. Sub acute exposures as short as a few days may cause mesothelioma.

4. State and Local Role

EPA has consulted with the Utah Department of Environmental Quality (UDEQ) concerning the sampling events and results. Neither UDEQ nor local agencies have the resources to conduct the needed site investigations or clean-ups independently.

C. Current Actions

Libby Amphibole (LA) mitigation inside Artistic Printing is complete.

All miscellaneous equipment and machines were cleaned and checked, with microvac samples collected at various, random locations. When analytical results showed non- detect for LA, the equipment was covered, with the shrouds sealed to the floor with duct tape. Structural portions of the 'press' room, the 'bindery' room, and the office area were then cleaned, cleared, and encapsulated. Initial clearance sampling in the press room showed 1 LA structure on the sample cartridge. Accordingly, the press room was re-cleaned, re-encapsulated, and re-cleared, with the new analytical results showing non-detect for LA. Following final clearance, crews commenced transferring stock, miscellaneous supplies, and other Artistic Printing items from storage trailers back into the cleaned building. Artistic Printing resumed limited production on June 2.

**Libby Amphibole (LA) mitigation inside the Frank Edwards Building (FEB) is complete.**

**Containment/isolation barriers were erected around interior office spaces. Old carpeting, drop ceiling panels, and non-essential wiring was stripped from the isolated spaces and removed for off-site dispoasl. Old ceiling insulaiton was removed from a portion of the FEB to off-site disposal. The building interior was cleaned by combinations of low-pressure water flushing and rinse, wet and dry wiping, and vaccuuming. Cleaning was followed by liberal use of encapsulant. After a single LA structure was detected in clearance samples collected in one of the smaller isolation areas, the area was re-vaccuumed and encapsulant re-applied. A subsequent clearance sample showed ND for LA. Response crews then installed replacement drop ceiling panels in the interior offices, replacement ceiling insulation bats in a portion of the FEB, and restored the HVAC system to a operational state. A final building walk-through with a representative of the building's owner was held on July 13, 2004, and the ERRS completed demob on July 16, 2004.**

**3rd Street (Electrical) Substation:**

**PRP conducted a pre-bid conference re: cleanup of the 2-story switch house on July 14, Initiation of PRP cleanup of the substation parcel is pending.**

D. Future Plans

**Ampco Parking Lot: State to continue negotiations with the PRP concerning institutional controls for the site.**

E. Key Issues

- None identified at this time

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
**REGION 8**
**999 18th Street – Suite 300**
**Denver, Colorado 80202**
**http://www.epa.gov/region8**

Ref: EPR-ER

**POLREP #9**
Vermiculite Intermountain Site
Salt Lake City, Utah

## I. HEADING

| | |
|---|---|
| **Date:** | **August 9, 2004** |
| From: | Floyd Nichols, On Scene Coordinator |
| | Craig Myers, On Scene Coordinator |
| Agency: | EPA/8 |
| Unit: | Region VIII - Emergency Response Program |
| | 999 18th Street, Suite 300 |
| | Denver Colorado 80202 |
| | (303) 312-6983 |
| **POLREP No:** | **POLREP #9** |
| Site: | Vermiculite Intermountain Site |
| | 333 West 100 South (former) |
| | Salt Lake City, Utah |

## II. BACKGROUND

| | |
|---|---|
| Site Number: | 08-GA |
| Party Conducting the Action: | EPA & PRP |
| Response Authority: | CERCLA |
| NPL Status: | No |
| Action Memorandum Status: | Approved - April 7, 2004 |
| **Fund-Lead Removal Action:** | |
| **Date Action Started:** | **April 14, 2004** |
| **Completion Date:** | **TBD** |
| **PRP-Lead Removal Action:** | |
| **AOC Issued:** | **April 9, 2004** |
| **PRP Action Start** | **April 9, 2004** |
| **PRP Completion** | **TBD** |

## III. SITE INFORMATION

A. Incident Category

Time Critical Removal Action

B. Site Description

1. Site description

Vermiculite Intermountain ('VI'), located on the west edge of downtown Salt Lake City, UT, is one of many facilities that received vermiculite ore from a mine near Libby, Montana. The Libby mine, at one time, produced about 80% of the world's supply of vermiculite ore. From Libby, some of the ore was shipped to various locations throughout the United States for further processing and distribution. Vermiculite ore from the Libby mine is co-mingled with amphibole asbestos of the tremolite-actinolite-richterite-winchite solution series ('tremolite asbestos'), and varying amounts of tremolite asbestos remain at many of the facilities which managed and/or processed ore from the Libby mine.

The VI facility received vermiculite ore in rail cars from 1940 until the early 1980s. In the mid 1980s, the facility was sold and the processing plant was relocated to another site several blocks away. At the VI facility, the ore was heated in a dry furnace until the imbedded layers of asbestos expanded ('exfoliated') (the process resembles that which happens to popcorn when it is heated). The exfoliated vermiculite (also known as "Zonolite) was then released to wholesale and retail markets for a variety of uses including home and building insulation and as a soil amendment. The original VI boundaries have changed over time - portions of the former site now consist of a Utah Power & Light (UPL) substation, a commercial parking lot, and small businesses. The surrounding neighborhood is primarily commercial and recreational.

2. Site evaluation and characteristics

The VI property and the surrounding area have undergone extensive urban redevelopment in the last 2-3 decades, and the original VI property boundaries are now indistinct. A former employee, however, stated that the majority of the VI exfoliation building was on the parcel now used by UPL (a PacifiCorp subsidiary) as an electrical substation. Some gravel fill has been placed in and around the substation hardware and across the adjacent parking/service areas. The substation is secured at all times by chain-link fencing and locked gates. Properties adjacent to the substation are currently used for a variety of municipal and/or commercial purposes.

During substation walkthrough inspections in 2002, what appeared to be vermiculite could be seen on the ground surface in several locations. EPA subsequently sampled portions of the substation property in October 2002. As geoprobe core samples were obtained, what appeared to be visible vermiculite/asbestos waste material (a.k.a., "stoner rock") could be seen in the cores. Analysis of surface and subsurface soils indicated percent-levels of tremolite asbestos in some surface locations and at some subsurface horizons.

Following EPA notification of the analytical findings, UPL, through a local asbestos firm in December 2002, removed loose vermiculite from the scarified ground surface using a high-efficiency vacuum in order to address immediate exposure concerns for their employees. Efficacy samples following that mitigation effort have not been collected.

Percent levels of tremolite asbestos remain in the subsurface at the UPL substation, and trace to percent levels are also present on the ground surface within the substation.

Additional Libby Amphibole (LA)-focused samples were collected at various locations within the (downtown) Salt Lake City one-square-block area (bordered by 100 South, 400 West, 200 South, and 300 West Streets) surrounding the old "VI" location.

Utah Paper Box Company

Ambient air samples, personal air samples, and dust samples were taken throughout the facility, and no LA contamination was found.

Artistic Printing

Ambient air samples, personal air samples, and dust samples were collected throughout the facility, with LA being detected in all dust and one ambient air sample. Following detailed discussions about activity timing and sequencing, the facility owner was able to identify an "economic window of opportunity" for the TCRA. Accordingly, EPA initiated the Removal on April 14, 2004.

Frank Edwards Building (owned by La Quinta Corporation)

Dust samples collected inside the vacant building showed LA contamination in two of three rooms. Mobilization for cleanup inside the building is expected in late-May.

AMPCO Parking Lot (owned by La Quinta Corporation)

Core samples show trace amounts of LA at a depth of 32" to 38" below the surface of the parking lot. Additional sub-surface samples are being collected across the parking lot in order to further define the extent of contamination. Scheduling of the TCRA for cleanup of the parking lot is pending.

3. Description of threat

Asbestos is a hazardous substance as defined by the NCP (40 CFR Section 302.4). Tremolite asbestos is of concern because chronic inhalation of excessive concentrations of the fibers can possibly result in lung diseases such as asbestosis, mesothelioma, and cancer. Sub acute exposures as short as a few days may cause mesothelioma.

4. State and Local Role

EPA has consulted with the Utah Department of Environmental Quality (UDEQ) concerning the sampling events and results. Neither UDEQ nor local agencies have the resources to conduct the needed site investigations or clean-ups independently.

## IV. RESPONSE INFORMATION

### A. Removal Actions - Fund-Lead

1. Libby Amphibole (LA) mitigation inside Artistic Printing is complete.

All miscellaneous equipment and machines were cleaned and checked, with microvac samples collected at various, random locations. When analytical results showed non- detect for LA, the equipment was covered, with the shrouds sealed to the floor with duct tape. Structural portions of the 'press' room, the 'bindery' room, and the office area were then cleaned, cleared, and encapsulated. Initial clearance sampling in the press room showed 1 LA structure on the sample cartridge. Accordingly, the press room was re-cleaned, re-encapsulated, and re-cleared, with the new analytical results showing non-detect for LA. Following final clearance, crews commenced transferring stock, miscellaneous supplies, and other Artistic Printing items from storage trailers back into the cleaned building. Artistic Printing resumed limited production on June 2.

2. Libby Amphibole (LA) mitigation inside the Frank Edwards Building (FEB) is complete.

Containment/isolation barriers were erected around interior office spaces. Old carpeting, drop ceiling panels, and non-essential wiring were stripped from the isolated spaces and removed for off-site disposal. Old ceiling insulation was removed from a portion of the FEB to off-site disposal. The building interior was cleaned by combinations of low-pressure water flushing and rinse, wet and dry wiping, and vacuuming. Cleaning was followed by liberal use of encapsulant. After a single LA structure was detected in clearance samples collected in one of the smaller isolation areas, the area was re-vacuumed and encapsulant re-applied. A subsequent clearance sample showed ND for LA. Response crews then installed replacement drop ceiling panels in the interior offices and replacement ceiling insulation bats in a portion of the FEB, and restored the HVAC system to a operational state. A final building walk-through with a representative of the building's owner was held on July 13, 2004, and the ERRS completed demob on July 16, 2004.

### B. Removal Actions - PRP-Lead

**3rd Street (Electrical) Substation:**

**PRP conducted a pre-bid conference re: cleanup of the 2-story switch house on July 14, and received bids for cleanup of the parcel surface and near-surface areas on July 30. Initiation of PRP cleanup of the switch house is scheduled for August 9, 2004. Contractor mobilization for cleanup of the parcel's surface and near-surface areas is pending.**

C. Future Plans

Ampco Parking Lot:

State will continue negotiations with the property owner concerning institutional controls for the site.

D. Key Issues

None identified at this time.

## V. COST INFORMATION

## VI. WASTE DISPOSITION

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
**REGION 8**

**POLREP #10**
Vermiculite Intermountain Site
Salt Lake City, Utah

## I. HEADING

| | |
|---|---|
| **Date:** | **September 29, 2004** |
| From: | Floyd Nichols, On Scene Coordinator |
| | Craig Myers, On Scene Coordinator |
| Agency: | EPA/8 |
| Unit: | Region VIII - Emergency Response Program |
| | 999 18th Street, Suite 300 |
| | Denver Colorado 80202 |
| | (303) 312-6983 |
| **POLREP No:** | **POLREP #10** |
| Site: | Vermiculite Intermountain Site |
| | 333 West 100 South (former) |
| | Salt Lake City, Utah |

## II. BACKGROUND

| | |
|---|---|
| Site Number: | 08-GA |
| Party Conducting the Action: | EPA & PRP |
| Response Authority: | CERCLA |
| NPL Status: | No |
| Action Memorandum Status: | Approved - April 7, 2004 |
| Fund-Lead Removal Action: | |
| Date Action Started: | April 14, 2004 |
| Completion Date: | TBD |
| PRP-Lead Removal Action: | |
| AOC Issued: | April 9, 2004 |
| PRP Action Start | April 9, 2004 |
| PRP Completion | TBD |

## III. SITE INFORMATION

A. Incident Category

Time Critical Removal Action

B. Site Description

1. Site description

Vermiculite Intermountain ('VI'), located on the west edge of downtown Salt Lake City, UT, is one of many facilities that received vermiculite ore from a mine near Libby, Montana. The Libby mine, at one time, produced about 80% of the world's supply of vermiculite ore. From Libby, some of the ore was shipped to various locations throughout

the United States for further processing and distribution. Vermiculite ore from the Libby mine is co-mingled with amphibole asbestos of the tremolite-actinolite-richterite-winchite solution series ('tremolite asbestos'), and varying amounts of tremolite asbestos remain at many of the facilities which managed and/or processed ore from the Libby mine.

The VI facility received vermiculite ore in rail cars from 1940 until the early 1980s. In the mid 1980s, the facility was sold and the processing plant was relocated to another site several blocks away. At the VI facility, the ore was heated in a dry furnace until the imbedded layers of asbestos expanded ('exfoliated') (the process resembles that which happens to popcorn when it is heated). The exfoliated vermiculite (also known as "Zonolite) was then released to wholesale and retail markets for a variety of uses including home and building insulation and as a soil amendment. The original VI boundaries have changed over time - portions of the former site now consist of a Utah Power & Light (UPL) substation, a commercial parking lot, and small businesses. The surrounding neighborhood is primarily commercial and recreational.

2. Site evaluation and characteristics

The VI property and the surrounding area have undergone extensive urban redevelopment in the last 2-3 decades, and the original VI property boundaries are now indistinct. A former employee, however, stated that the majority of the VI exfoliation building was on the parcel now used by UPL (a PacifiCorp subsidiary) as an electrical substation. Some gravel fill has been placed in and around the substation hardware and across the adjacent parking/service areas. The substation is secured at all times by chain-link fencing and locked gates. Properties adjacent to the substation are currently used for a variety of municipal and/or commercial purposes.

During substation walkthrough inspections in 2002, what appeared to be vermiculite could be seen on the ground surface in several locations. EPA subsequently sampled portions of the substation property in October 2002. As geoprobe core samples were obtained, what appeared to be visible vermiculite/asbestos waste material (a.k.a., "stoner rock") could be seen in the cores. Analysis of surface and subsurface soils indicated percent-levels of tremolite asbestos in some surface locations and at some subsurface horizons.

Following EPA notification of the analytical findings, UPL, through a local asbestos firm in December 2002, removed loose vermiculite from the scarified ground surface using a high-efficiency vacuum in order to address immediate exposure concerns for their employees. Efficacy samples following that mitigation effort have not been collected.

Percent levels of tremolite asbestos remain in the subsurface at the UPL substation, and trace to percent levels are also present on the ground surface within the substation.

Additional Libby Amphibole (LA)-focused samples were collected at various locations within the (downtown) Salt Lake City one-square-block area (bordered by 100 South, 400 West, 200 South, and 300 West Streets) surrounding the old "VI" location.

Utah Paper Box Company

Ambient air samples, personal air samples, and dust samples were taken throughout the facility, and no LA contamination was found.

Artistic Printing

Ambient air samples, personal air samples, and dust samples were collected throughout the facility, with LA being detected in all dust and one ambient air sample. Following detailed discussions about activity timing and sequencing, the facility owner was able to identify an "economic window of opportunity" for the TCRA. Accordingly, EPA initiated the Removal on April 14, 2004.

Frank Edwards Building (owned by La Quinta Corporation)

Dust samples collected inside the vacant building showed LA contamination in two of three rooms. Mobilization for cleanup inside the building is expected in late-May.

AMPCO Parking Lot (owned by La Quinta Corporation)

Core samples show trace amounts of LA at a depth of 32" to 38" below the surface of the parking lot. Additional sub-surface samples are being collected across the parking lot in order to further define the extent of contamination. Scheduling of the TCRA for cleanup of the parking lot is pending.

3. Description of threat

Asbestos is a hazardous substance as defined by the NCP (40 CFR Section 302.4). Tremolite asbestos is of concern because chronic inhalation of excessive concentrations of the fibers can possibly result in lung diseases such as asbestosis, mesothelioma, and cancer. Sub acute exposures as short as a few days may cause mesothelioma.

4. State and Local Role

EPA has consulted with the Utah Department of Environmental Quality (UDEQ) concerning the sampling events and results. Neither UDEQ nor local agencies have the resources to conduct the needed site investigations or clean-ups independently.

## IV. RESPONSE INFORMATION

### A. Removal Actions - Fund-Lead

1. Libby Amphibole (LA) mitigation inside Artistic Printing is complete.

All miscellaneous equipment and machines were cleaned and checked, with microvac samples collected at various, random locations. When analytical results showed non- detect for LA, the equipment was covered, with the shrouds sealed to the floor with duct tape. Structural portions of the 'press' room, the 'bindery' room, and the office area were then cleaned, cleared, and encapsulated. Initial clearance sampling in the press room showed 1 LA structure on the sample cartridge. Accordingly, the press room was re-cleaned, re-encapsulated, and re-cleared, with the new analytical results showing non-detect for LA. Following final clearance, crews commenced transferring stock, miscellaneous supplies, and other Artistic Printing items from storage trailers back into the cleaned building. Artistic Printing resumed limited production on June 2.

2. Libby Amphibole (LA) mitigation inside the Frank Edwards Building (FEB) is complete.

Containment/isolation barriers were erected around interior office spaces. Old carpeting, drop ceiling panels, and non-essential wiring were stripped from the isolated spaces and removed for off-site disposal. Old ceiling insulation was removed from a portion of the FEB to off-site disposal. The building interior was cleaned by combinations of low-pressure water flushing and rinse, wet and dry wiping, and vacuuming. Cleaning was followed by liberal use of encapsulant. After a single LA structure was detected in clearance samples collected in one of the smaller isolation areas, the area was re-vacuumed and encapsulant re-applied. A subsequent clearance sample showed ND for LA. Response crews then installed replacement drop ceiling panels in the interior offices and replacement ceiling insulation bats in a portion of the FEB, and restored the HVAC system to a operational state. A final building walk-through with a representative of the building's owner was held on July 13, 2004, and the ERRS completed demob on July 16, 2004.

B. Removal Actions - PRP-Lead

**3rd Street (Electrical) Substation:**

PRP conducted a pre-bid conference re: cleanup of the 2-story switch house on July 14, and received bids for cleanup of the parcel surface and near-surface areas on July 30. PRP cleanup of the switch began August 9, 2004 and took about ten days to complete. **Primary mobilization for cleanup of the balance of the substation began on August 23. Excavation of contaminated portions of the site with removal of asbestos-contaminated materials to an off-site disposal facility is continuing. Work site and perimeter air monitoring is being performed by PRP and EPA crews. Clearance sampling is being performed by EPA crews.**

C. Future Plans

Ampco Parking Lot:

State will continue negotiations with the property owner concerning institutional controls for the site.

D. Key Issues

None identified at this time.

## V. COST INFORMATION

## VI. WASTE DISPOSITION

**To date, approximately 2,600 cubic yards of asbestos-contaminated material (ore, stoner rock, exfoliated vermiculite, clinkers, contaminated dirt, etc.) have been excavated and removed from the substation and taken to a regulated disposal site approximately 60 miles west of Salt Lake City.**

# Enclosure 5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
999 18TH STREET - SUITE 300
DENVER, CO 80202-2466
Phone 800-227-8917
http://www.epa.gov/region08

November 24, 2004

Ellison Stollenwerck
La Quinta Inns
909 Hidden Ridge, Suite 600
Irving, TX 75038

OPTIONAL FORM 99 (7-90)
FAX TRANSMITTAL
# of pages ▶
To: Ellison Stollenwerck
From: Floyd Nichols
Dept./Agency: La Quinta
Phone #: 303.312.6983
Fax #: 214.492.6453
Fax #: 303.312.6962
NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION
Vince Romney 801.352.2381
801.578.5506

RE: Vermiculite Intermountain Site
Salt Lake City, Utah

Dear Ms. Stollenwerck:

The purpose of this letter is to provide you with background information and a status update regarding the Vermiculite Intermountain (VI) site, bounded by 100 South, 300 West, 200 South, and 400 West Streets, Salt Lake City (Site). As we have previously discussed, EPA, in April 2004, initiated a Superfund Removal action at the Site, which is heavily contaminated with Libby Amphibole (LA) asbestos. The intent of this ongoing Removal is to remove for offsite disposal, to the maximum extent practical, all visible amounts of identifiable traces of LA from the Site. Physical features of this Site consists primarily of the Artistic Printing Co. (building) on the northwest corner of the parcel, the Frank Edwards building ('FEB') on the northeast corner of the parcel, the Utah Power & Light (UPL) - 3rd West Electrical Substation on the southwest corner of the parcel, and the Ampco parking lot covering the balance of the parcel.

Between mid-April and mid-September of 2004, EPA spent over 18,000 labor hours to clean the interior of the Artistic Printing Co. facility and the Frank Edwards Building. Subsequent to that EPA effort, PacifiCorp, parent company of UPL, pursuant to an EPA-PacifiCorp Administrative Order on Consent (AOC), initiated cleanup of the 3rd West Substation. EPA has overseen and monitored this PacifiCorp-funded phase of the cleanup since it began. This particular phase of the Removal is now nearing completion, with completion anticipated by the end of December.

PacifiCorp's cleanup began with LA abatement inside the switch house, a small, 2-story structure in the center of the substation parcel. After achieving LA clearance standards inside the switch house work spaces, PacifiCorp began excavating adjacent substation areas. PacifiCorp is essentially excavating and removing all visible LA and LA-contaminated materials encountered during excavation, continuing the excavation in any particular spot until 'clean' areas are

encountered at the sides and bottom of the resultant 'pit'. Once 'clean' areas are encountered, the bottom and side-walls of the excavation are sampled by EPA so as to determine, analytically, the efficacy of the LA removal effort. Once the excavated area has been cleared by EPA, it is scheduled for backfilling and restoration by PacifiCorp.

Before excavations began inside the substation fence, both EPA and PacifiCorp estimated the amount of material needing to be dug up and hauled off from this 1.3± acre Site to be approximately 3,900 cubic yards of LA-contaminated soils and debris. To date, approximately 13,000 cubic yards of material have been removed for disposal, and excavations are continuing. The volume of LA remaining at the site in early 2004 was underestimated because we had no clear understanding as to how, and to what extent, demolition of the Vermiculite Intermountain facilities had been accomplished in the late 1980s.

PacifiCorp has now removed at least two feet of contaminated material from most of the substation, an additional 2-4 feet of material in certain areas of the substation, and materials to a depth of 14-16 feet in certain other areas. PacifiCorp has encountered subsurface lenses and discontinuous pockets of Vermiculite ore, exfoliated product, un-exfoliated asbestos fines and bundles, what appears to be furnace, flue, and/or stack clinkers, and other miscellaneous LA-contaminated materials. Also, the excavation grew so as to include the old rail bed (remains of the spur line which serviced, at one time, the VI facility) transiting through the substation, beginning at a depth of approximately two feet below ground surface (bgs) and extending downward to approximately five feet bgs.

As excavations continued in the eastern part of the substation, the pit boundaries approached the UPL fence separating the substation and the Ampco parking lot. By late last week, excavation west of the fence line had progressed to the point where it became apparent that an unknown amount of visible LA extended from the substation, under the fence, and beneath the parking lot. Again, PacifiCorp continues excavating along the west side of the fence, hoping to complete the digging in this area by late in the week of November 29. Accordingly, we will be able to add to our understanding of subsurface conditions at the fence line in early December.

Following are descriptions of the three locations along the fence where visible LA has recently been identified. These three areas are depicted on the enclosed sketch of the substation parcel (Please also refer to the substation drawing I sent to you via fax earlier today.):

> Location 1, at the southeast corner of the substation. A small concrete wall, running e-w, located approximately 8 feet bgs, appears to be part of an old VI loading dock. Excavations showed a 'seam' of LA running east along the base of the wall at least as far as the fence line. Old site maps indicate the structure may have extended at least 30 feet beyond the fence line.
>
> Location 2, near the northeast corner of the substation parcel, where the n-s trending and e-w trending fence intersect. This LA-contaminated seam, visible at a depth of

approximately 15 inches bgs, underlies the fence intersection. The seam apparently extends for a short distance onto the parking lot.

Location 3, along the old track rail bed, past the fence line, onto the parking lot. As we have found, substantial quantities of 'enriched' LA residues have been excavated from along the old rail bed, across the substation parcel. Old maps and photographs of the Site show the original rail bed extending through the Site, from 400 West Street to 300 West Street. The rail bed, at the fence line, lies at an approximate depth of 5 feet bgs, extending downward from there for another 3 feet. On the substation side of the fence, LA residues extend laterally from the rail line to varying distances. Our experience suggests that substantial LA residues will likely be present at the fence line in subsurface horizon(s) when PacifiCorp excavations conclude the end of next week.

On Monday, November 22, I briefed Rick Davidson, one of La Quinta's Salt Lake City representatives, and Jeff Phillips, a representative of Richard Gordon, Westgate Business Center. Participating in the briefing were representatives of PacifiCorp and the Utah Department of Environmental Quality. During our discussion, we reviewed the previous Site activities, status of the current substation cleanup, our current assumptions as to LA contamination remaining under the fence and extending beneath the Ampco parking lot when PacifiCorp terminates its excavations at the end of next week, and my concept of continuing Site cleanup activities beyond next week.

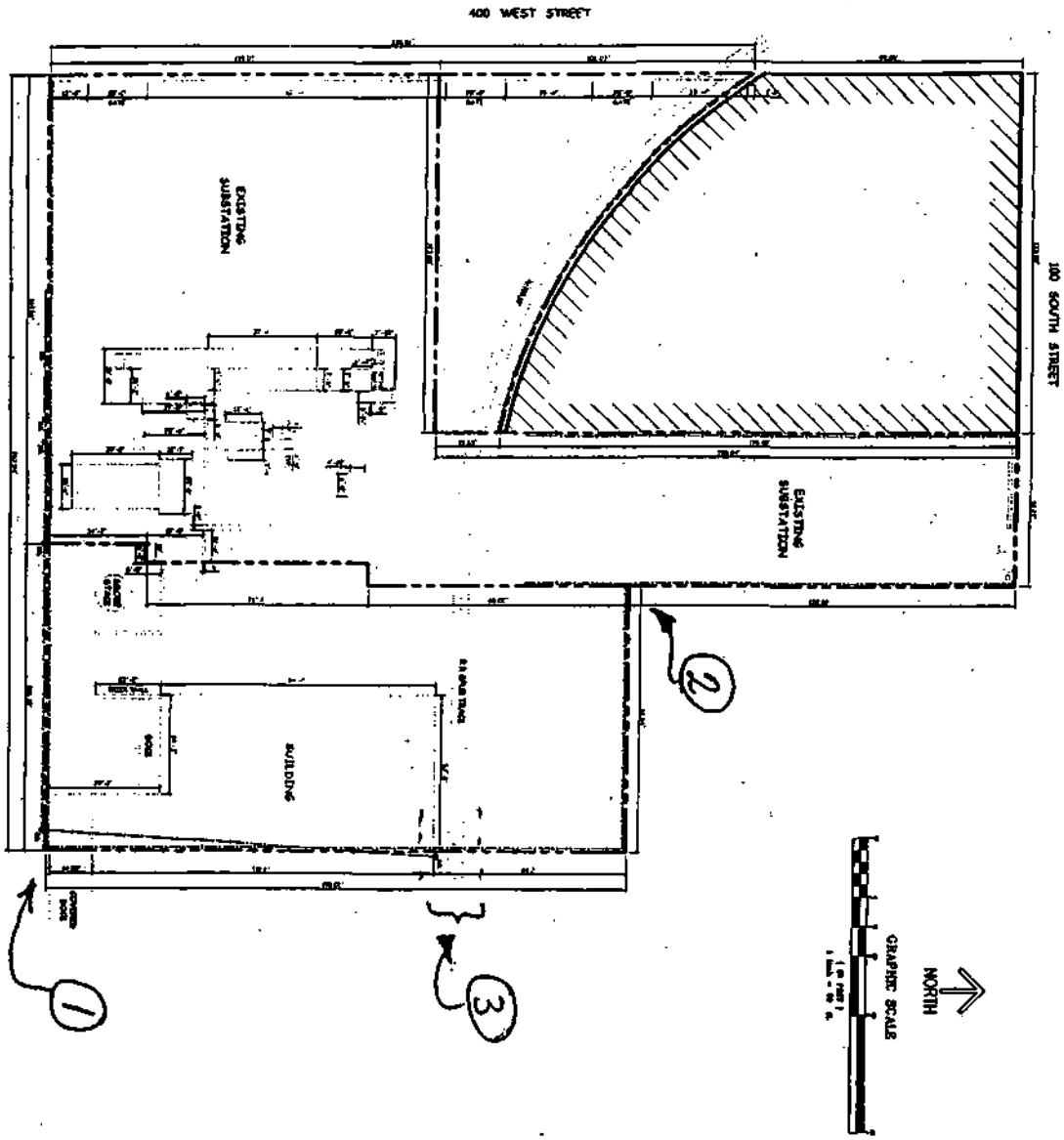
After you have had an opportunity to review and consider this letter, the enclosed sketch and the drawing I faxed to you earlier today, I would like an opportunity to discuss this matter and future plans for cleanup of the Site with you. I can be reached at (303) 312-6983. In addition, EPA Enforcement Attorney Suzanne Bohan, will be EPA's legal contact for the Site for the next several months, while Matt Cohn is away from the office. Suzanne can be reached at (303) 312-6925.

I look forward to hearing from you.

Sincerely,

Floyd D. Nichols
On Scene Coordinator, EPA/8

cc: Suzanne Bohan, 8ENF-L
Craig Barnitz, UDEQ (via fax)




| | | | | | | |
|---|---|---|---|---|---|---|
| R&B ENVIRONMENTAL, INC. | PACIFICORP 1407 West North Temple Salt Lake City, Utah 84116 | PACIFICORP 3RD WEST SUBSTATION REMEDIATION PROJECT 2004 | SCALE 1"=20' | PROJ#: 1104-001R DWG.File: SITE | SHEET NO. |
| | | SITE PLAN | DRAWN T.R.B. | DATE 11/05/2004 | 1 |